
Appendix J – DEIS Comments

**I-94 Rehabilitation Project
Detroit, Wayne County, Michigan**

**Comments received on the
Draft Environmental Impact Statement
&
Draft Section 4(f) Evaluation**

SOLICITED COMMENTS

State of Michigan



JOHN ENGLER, Governor

Department of Agriculture

DAN WYANT, Director

Commission of Agriculture

Douglas E. Darling
James E. Maltland
William G. Pridgeon
Jordan B. Tatter
Nora M. Viau

March 6, 2001

Mr. Ronald S. Kinney, Manager
Environmental Section
Project Planning Division
Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

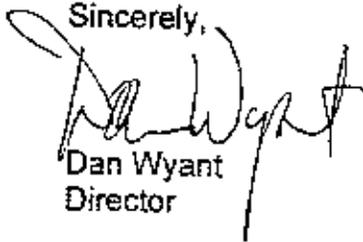
Dear Mr. Kinney:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the I-94 Rehabilitation Project within the City of Detroit. The Rehabilitation Project would provide transportation improvements to 6.7 miles of I-94 (Edsel Ford Freeway) from east of I-96 on the west end to immediately east of the Conner Avenue interchange on the east end. The preferred "Build Alternative" would involve the total reconstruction of this section of highway, complete with new bridges, ramps, etc.

The potential environmental impacts of concern to this department are the runoff and drainage impacts to the existing system of county and inter-county drains. We recommend continual contact with Mr. James Abron, P.E., Wayne County Drain Commissioner, throughout the development of this proposal, particularly if the "Build Alternative" is pursued. Mr. Abron's telephone number is (313) 224-6665.

Again, thank you for the opportunity to comment.

Sincerely,



Dan Wyant
Director





United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER-01/112

MAR 30 2001

Mr. James J. Steele
Division Administrator
Federal Highway Administration
315 West Allegan Street, Room 207
Lansing, Michigan 48933-1528

Dear Mr. Steele:

As requested in your February 9, 2001, letter, the U.S. Department of the Interior (Department) has reviewed the January 2001 Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the proposed rehabilitation of the I-94 corridor from I-96 to Conner Avenue in Detroit, Wayne County, Michigan. The Department offers the following comments and recommendations for your consideration.

SECTION 4(D) EVALUATION COMMENTS

We concur that there is no feasible and prudent alternative to the proposed project, if project objectives are to be met. We also concur with the proposed measures to minimize harm to the Woodbridge Neighborhood Historic District, which is listed on the National Register of Historic Places (NRHP), and the following NRHP-eligible structures: the house at 5287 Hecla Street, the store at the corner of Trumbull and the I-94 service drive, the I-94/M-10 interchange bridges, and the United Sound Systems Recording Studios. A signed memorandum of agreement that demonstrates that the Michigan State Historic Preservation Officer and the Advisory Council for Historic Preservation concur with the proposed mitigation should be included with the final Section 4(f) Evaluation. The Department has no objection to Section 4(f) approval of this project by the Department of Transportation.

ENVIRONMENTAL IMPACT STATEMENT COMMENTS

The DEIS adequately addresses other issues of concern to the Department. We have no specific comments on the DEIS. We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor
Director, Office of the Environmental
Policy and Compliance

SEMCOG . . . Local Governments Advancing Southeast Michigan

Southeast Michigan Council of Governments • 535 Griswold Street • Suite 300 • Detroit, Michigan 48226 • 313-961-4266 • Fax 313-961-4866
<http://www.semco.org>

April 2, 2001

Ronald S. Kinney, Manager
Michigan Department of Transportation
Project Planning Division/Environmental Section
P.O. Box 30050
Lansing, Michigan 48909

RE: Draft Environmental Impact Statement (DEIS) from the U.S. Department of Transportation/Federal Highway Administration for a project entitled "I-94 Freeway Rehabilitation Project, East of I-96 to Conner Avenue, Detroit, Wayne County, Michigan"
Regional Clearinghouse Code: TR 010033

Dear Mr. Kinney:

SEMCOG, the Southeast Michigan Council of Governments, has processed a review for the above Draft EIS according to intergovernmental review procedures established in NEPA and Federal agency guidelines

As the designated regional planning agency for Southeast Michigan, we notified the following local government agencies of your project:

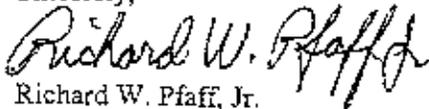
Wayne County Planning Division
Detroit Planning & Development Department
Suburban Mobility Authority for Regional Transportation

As of this date, no comments have been received. We will forward comments, if any, for your information and attention.

SEMCOG's staff has reviewed the Draft EIS which you submitted and offers attached comments from our Transportation Program staff (C. Palombo 3/30/2001) and Environmental Program staff (B. Parkus 3/6/2001).

We look forward to your response and the Final EIS when it is completed.

Sincerely,



Richard W. Pfaff, Jr.
Regional Review Coordinator

RWP/bar

Attachments

MEMO

Southeast Michigan Council of Governments
535 Griswold, Suite 300
Detroit, MI 4827
(313) 961-4266
Fax (313) 961-4869
www.semco.org

March 30, 2001

TO: Rich Pfaff

FROM: Carmine Palombo

SUBJECT: I-94 Draft Environmental Impact Statement & Section 4(f) Evaluation

The Transportation Department has reviewed the *I-94 Draft Environmental Impact Statement & Section 4(f) Evaluation* and offers the following comments.

General comments

The I-94 corridor is a valuable transportation asset in Southeast Michigan. We support the efforts of the Michigan Department of Transportation to rehabilitate the corridor from I-96 to Conner Avenue in the City of Detroit, thereby improving freeway capacity, safety, and pavement conditions as well as local traffic circulation. The I-94 Rehabilitation Project is listed as a study in the *2025 Regional Transportation Plan for Southeast Michigan (2025 RTP)*. The project is clearly consistent with 2025 RTP goals and we anticipate the movement of this study to the next phases of design and construction.

Evaluation Summary

- 6.6 Air Quality (page 15) — The project is in the current RTP and TIP as a study only and has not been modeled for air quality conformity. The entire project must be in a conforming RTP and at least one phase of the project in the TIP, including funding sources, and FHWA and FTA must issue a finding of conformity before the Record of Decision can be submitted for approval.

Draft Environmental Impact Statement and Section 4(f) Evaluation

- 2.2 Project Background (page 2-4) — The I-94 study is also listed in the 2025 RTP.
- 2.5.6 Transit, Pedestrians, and Bicyclists (page 2-14) — It is not enough to suppose the new service drives will provide "opportunities for improved transit." MDOT should commit to working with DDOT and SMART to enhance transit service in and through the area. Are routes along the service drives likely to be added? Have the transit agencies been involved during development of the Preferred Alternative? Are there plans and committed funding sources for amenities, including shelters along the service drives to protect transit users from increased traffic, etc.? (This represents a potential environmental justice issue.)

- 4.5.2 Transit (page 4-22) — The 2025 RTP calls for investing \$5.5 billion in transit, not more than \$6 billion as the text currently reads.
- 4.7.1 Goal 1 - Mobility (page 4-34) — With respect to analyzing the Recommended Alternative for commercial traffic, SEMCOG's commercial vehicle model is tentatively scheduled to be available in January 2002. If that time line corresponds to the analysis of the Recommended Alternative, it can be used for evaluation purposes.
- 5.1.1.4 Non-Motorized Mobility (page 5-15) — While SEMCOG agrees the addition of continuous service drives with sidewalks and sidewalks on vehicular bridges over the freeway should enhance non-motorized access, specific attention should continue to be paid to this issue. In particular, the safety of pedestrians and bicyclists along and across the service drives and bridges is a concern. Pedestrian facilities must be more than just sidewalks; they must consist of properly designed walkways, accessible and properly placed crosswalks, etc. Also of concern is the removal/consolidation of some pedestrian bridges. The report states that the high percentage of households without autos increases citizen reliance on non-motorized travel and transit travel (which also requires pedestrian access to transit stops). Therefore, any plans to modify non-motorized access along and across the freeway should be carefully scrutinized with respect to the impacts on local citizens and community connectivity and should be subject to review by the citizens. An organized meeting of the consultants, citizens, non-motorized experts, and MDOT is also recommended during the design phase.
- 5.1.5 Environmental Justice (page 5-23) — USDOT and FHWA do not specifically outline how environmental justice analyses should be performed. SEMCOG is working with FHWA to develop appropriate regional analysis tools, which may be used to analyze this project upon submittal for inclusion in the RTP and TIP.
- 5.1.5.2 Actions to Address Disproportionately High and Adverse Effects (page 5-26) — A toll-free number for comments/complaints does not seem sufficient. Is there an approachable project office located in the area for residents to access information and convey complaints and concerns during construction?
- 5.5.3.2 Attainment Status of the Project Area (page 5-49) — Southeast Michigan is a maintenance area for 1-hour ozone, not an attainment area as the text currently reads.
- 5.2 Economic Environment
 - The text states that the build alternative would displace five businesses (page 5-31) but also references Table 5-7 (page 5-18) which indicates 15 business structure displacements. Do the five businesses occupy multiple structures? Please clarify.
 - It is acknowledged that businesses relocated some distance away from their original locations would have to reestablish a customer base and could lose money temporarily. Non-displaced businesses could also experience temporary losses during construction. It is suggested that mitigation expand beyond relocation assistance. (This represents a potential environmental justice issue.) For example:
 - a special fund could be set up to cover interim operating losses to sustain businesses during construction,

- focused assistance could be offered to help business owners take full advantage of empowerment and renaissance zones where they exist, and
 - incentives could be offered for businesses to relocate in the same general area to continue serving the community (the report notes that Segment B particularly depends on corner stores for basic shopping).
-
- 5.11.2.1 Existing Historic Resources (page 5-80) — The text states that 15 additional buildings must be surveyed to determine NRHP eligibility. Why were these structures not surveyed prior to issuing the DEIS? If they are found to be eligible, how will that impact the continuation of the project?

MEMO

Southeast Michigan Council of Governments
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Detroit, MI 48226
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Fax (313) 961-4869
<http://www.semco.org/>

March 6, 2001

TO: Rich Pfaff, Jr.

FROM: Bill Parkus

SUBJECT: Draft Environmental Impact Statement, I-94 Freeway Rehabilitation Project
Regional Clearinghouse Code: TR 010033
Michigan Department of Transportation

SEMCOG staff has reviewed the above referenced Draft Environmental Impact Statement and finds it to be consistent with the *Water Quality Management Plan for Southeast Michigan*. In general, no impacts from storm water are expected. Storm water is conveyed from the expressway in Detroit's combined-sewers for treatment at the wastewater treatment plant, then released to the Detroit River. However, Thirty contaminated sites could potentially impact the project. At contaminated sites in which the soil will likely be disturbed due to construction, sewer manholes and catch basins should be protected from contaminated runoff to the extent possible. Thus, a permit under Part 91 (Soil Erosion and Sedimentation Control) of P.A. 451 of 1994, the Natural Resources and Environmental Protection Act, may be required.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

OFFICE OF STRATEGIC ENVIRONMENTAL ANALYSIS
FAX COVER SHEET
MAIL CODE: B-19J
FAX NUMBER: (312) 353-5374

TO: *Ron Kinney MDOT*
PHONE: _____ FAX: *517-373-9255*
FROM: *Sherry Kamke*
PHONE: *312-353-5794* FAX: (312) 353-5374
DATE: *5/11/01* # OF PAGES: *9* (including cover) +1 = *10*

COMMENTS:

Ron,

Please see the enclosed DEIS comment letter on the I-94 project. We tried to call to discuss our comments but just reached voicemail for you, Mike O'Malley, Lori Noble + Jeff Saxby. We will be available to discuss this on Monday. Please contact us

Sherry



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 11 2001

REPLY TO THE ATTENTION OF:

B-19J

Mr. James A. Kirschensteiner
Federal Highway Administration
Programs & Environmental Engineer
315 West Allegan
Room 211
Lansing, Michigan 48933

Re: Comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the I-94 Rehabilitation Project from I-96 to Conner Avenue, Detroit, Wayne County, Michigan, EIS No. 010041

Dear Mr. Kirschensteiner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the I-94 Rehabilitation Project from I-96 to Conner. This DEIS evaluates transportation improvements proposed for a 6.7-mile portion of I-94 from I-96 on the west to Conner Avenue on the east. Two major interchanges in this segment, the M-10 Lodge freeway and the I-75 interchanges are also being proposed for reconstruction.

Information provided in the DEIS indicates that there are problems that need to be addressed along this 6.7-mile long section. This section of I-94 was built in the 1940's and 1950's. The geometrics, pavement and bridge conditions are below standard. Currently, the mainline of I-94 is 6-lanes (three in each direction), there are incomplete acceleration/deceleration lanes, and some service drives exist but they are not continuous. The DEIS states that traffic volumes are heavy during most daylight hours with some segments operating over capacity during peak periods. Under the No-Build scenario, most segments of I-94 would operate at LOS D or F in the year 2020 during the peak hours. It is clear that some action is needed in this area in order to improve capacity, safety, pavement and bridge conditions on I-94. The action is also needed to enhance local traffic circulation in the area.

Three alternatives are evaluated in detail in the DEIS: (1) the No-Build Alternative, (2) the Enhanced No-Build Alternative, and (3) the Build Alternative. The No-Build Alternative would involve no construction on I-94 and would only include maintenance of the existing facility and replacement of bridges as they deteriorate. The Enhanced No Build Alternative would reconstruct the existing freeway and bridges, improve shoulders and ramps, construct auxiliary, acceleration and deceleration lanes while maintaining the freeway, interchanges and bridges. The Build Alternative would consist of addition of two driving lanes on the I-94 mainline (one in each

direction), acceleration/deceleration lanes and three-lane continuous service drives on both sides of the interstate. The existing roadway and bridges would be reconstructed and space would be reserved in the median to accommodate future lane expansion or transit.

U.S. EPA has reviewed the DEIS and other associated documents. Our review has identified several issues that were not adequately addressed in the DEIS. These issues are in the areas of Scope of Analysis, Purpose and Need, Alternatives Analysis, Air Quality, Noise, Pedestrian and Bicyclist Impacts, Costs, and Cumulative Impacts. Our detailed comments are provided in the enclosure titled: *U.S. EPA Comments on the I-94 Rehabilitation Project Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation, May 2001*. Based on these comments, the U.S. EPA rates the DEIS as "EO-2." A copy of our rating criteria is enclosed.

Thank you for the opportunity to comment on this DEIS. We are always available to discuss these comments if you would find that useful. Please contact Sherry Kamke of my staff at 312-353-5794 for any questions or concerns that you would like for us to address.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

cc: Jeff Saxby, MDOT
Gerald Fulcher, MDEQ

*U.S. EPA Comments on the I-94 Rehabilitation Project
Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation
May 2001*

Scope of Analysis

The proposed action would involve improvements to a 6.7-mile portion of I-94 from I-96 on the west to Conner on the east yet the traffic study limits extend past this area to include additional segments on the east and west of this project. The DEIS makes a reference on page 3-5 to "a series of proposed projects to improve the transportation system in Detroit and southeast Michigan" and references that this project "is the first of other I-94 improvement projects in southeast Michigan." No other specific details are included in the DEIS. U.S. EPA sought additional information regarding other I-94 projects that were being contemplated. MDOT's Five-year Road and Bridge Program - Volume III 2001-2005 (p.81) indicates that the I-94 project from I-96 to Connor Avenue is the first phase of a larger project extending from Wyoming Avenue in the city of Detroit to I-696 in Macomb County. The Build Alternative that is evaluated in detail in the DEIS makes more sense as part of an improvement program for a larger segment of I-94 than what is evaluated within this DEIS. Otherwise, the improvements to the mainline, auxiliary and service drive lanes will end at this project's termini, which has the potential to create bottlenecks at a point where the roadway capacity drastically decreases.

Due to the issues discussed above, we question whether the evaluation conducted in this DEIS meets the requirements specified in the Federal Highway Administration (FHWA) NEPA implementing regulations at Title 23 Code of Federal Regulations (CFR) Part 771.111 (f). The regulations discuss what scope of analysis is appropriate in order to ensure a meaningful evaluation of alternatives and in order to avoid commitment to transportation improvements before full evaluation. We have concerns related to how this project's scope meets the requirements for logical termini, independent utility and appropriate consideration of alternatives for other foreseeable transportation improvements on I-94. We suggest that FHWA reconsider its termini points. We recommend that FHWA and MDOT evaluate I-94 improvements using a tiered EIS process. The first tier would evaluate improvements on the 18-mile segment of I-94 from Wyoming Avenue to I-696 and then segment-specific EISs would tier off from that first tier EIS. This approach would allow for a broad consideration of improvements along the entire corridor.

Purpose and Need

The information presented in the DEIS clearly shows that there are problems that need to be addressed in the I-94 Corridor from I-96 to Connor. The problems of deteriorating pavement and bridges, along with the lack of shoulders and substandard interchanges, are apparent. It is clearly prudent to address the need for system improvements at the same time infrastructure maintenance is addressed. We note that there is a long history of planning and major investment study work conducted in this area. We believe that it is important to draw on these previous studies wherever possible while recognizing changes that have occurred since those studies were conducted.

EPA concurs that there is a real need for improvements in the I-94 corridor. However, as we have mentioned under "Scope of Analysis" above, we question why MDOT and FIIWA have scoped the project as they have.

We have additional questions regarding statements made in DEIS regarding truck traffic on I-94. We note that the Purpose and Need Section on page 2-12 states that Average Annual Daily Traffic (AADT) is at 120,000 - 160,000, and it is expected to grow by more than 25 percent by the year 2020. This growth doesn't include international border crossings and the associated amount of heavy-truck traffic, which is expected to grow at a rate three times faster than passenger vehicle volume. The DEIS mentions the North American Free Trade Agreement (NAFTA) and how international trade is increasingly important to Michigan's economy. However, there is no information in the DEIS that discussed how NAFTA has affected international traffic and what that might mean for the Detroit area. If the I-94 corridor is experiencing increasing traffic or will likely be experiencing increased traffic because of NAFTA, additional information should be provided in NEPA documentation reflecting this.

Similarly, the DEIS shows a location of the proposed intermodal freight facility in Figure 2-1, a figure depicting the Traffic Study, Project Limits and Intermodal Freight Facility. No other information is presented within the text of the DEIS to explain how the siting of an intermodal freight facility may impact local, regional and international truck and rail traffic patterns. More information on the current and future projections for local, regional and international freight traffic should be included in subsequent NEPA documentation.

Alternatives Analysis

The DEIS evaluates a No-Build Alternative, an Enhanced No-Build Alternative and the Build Alternative. U.S. EPA views the Build Alternative as consisting of five components: (1) Rebuild/enhance capacity on existing I-94 mainline with addition of shoulders and auxiliary lanes, (2) Interchange improvements (including acceleration/deceleration lanes), (3) Bridge replacements, (4) Service drive enhancements, and (5) Preservation of median space for future expansion.

The DEIS summarizes the process by which alternatives were selected for further evaluation. Although the Alternatives section does an adequate job of describing why many highway design options were eliminated, it does not provide enough of information to substantiate why transit alternatives were eliminated from consideration. It appears, based on information presented on page 4-15, that the only transit alternative that was evaluated is a bus alternative that would utilize High Occupancy Vehicle (HOV) lanes. The HOV lane alternative was eliminated because the FIIWA guideline for a minimum threshold of 500 vehicles per hour per lane would not have been met. The rationale for the elimination of the HOV lane alternative stated "to optimize the benefits and be most effective, the HOV lanes would have to extend beyond the study limits of the project."

It isn't clear from the information presented in the DEIS what segment length was used in the HOV analysis. Also, it wasn't clear what traffic projections (current or design year [2020]) were used. The NEPA documentation should describe in more detail what the basis was for eliminating this alternative from consideration.

Similarly, the DEIS does not provide an adequate discussion as to why the Build Alternative being proposed has the components that are being proposed. The lack of information regarding the need for reserve median space and three continuous service drives stands out as examples of where relevant information is lacking. Without information specifying why 54.5-feet of median space are needed and why three lanes of continuous service drive (two 12-foot lanes and one 16-foot multi-use lane) are needed, questions will remain regarding what function the median space and the service drives will provide. We note that the DEIS makes several references to how the redesign of I-94 would facilitate future transit options along I-94. According to the DEIS, the reserved space in the median, continuous service drives and increased height of the bridges would all accommodate future transit use. U.S. EPA supports efforts to accommodate transit in project design wherever possible. However, it isn't clear if there will actually be a transit component to this project. Without some specific tie-in to a transit vision or plan that utilizes this corridor, it appears just as likely, or possibly more likely, that the reserved median space and the multi-use lane of the continuous service drive will be used to provide additional highway capacity.

As we have stated in our comments on the I-375 Environmental Assessment comment letter, dated February 12, 2001, we support comprehensive transportation planning for the Detroit area that includes both highway and transit components. This comprehensive planning is the only way to ensure that appropriate linkages between the systems are planned for and potential conflicts are remedied. We very much support the Transit Visioning Process for the Detroit area, which is being led by the Southeast Michigan Council of Governments (SEMCOG). We look for the visioning process to lead to viable transit projects that will benefit the region by increasing transportation choices for users and result in environmental benefits. In the case of this project, it would be prudent to not only accommodate transit scenarios involving I-94 that arise from the visioning process, but also to consider integrating transit components with highway improvements.

Since the level of service goals would be more than adequately met by implementation of the Build Alternative [LOS B,C, D would be achieved and LOS D/E is usually the goal within an urban setting], an alternative that scales down one or more of the components (mainline, service drives and/or median) might be viable. We believe there may be additional feasible alternatives that have not yet been evaluated that would meet project goals and objectives. The DEIS states that several transit alternatives (modified bus service, bus rapid transit, and light rail) were retained as compatible with a practical alternative, but eliminated as a stand-alone alternative. No evaluation was conducted of an alternative that included both highway and transit improvements. We would like to see additional build alternatives, including one with a transit component, be evaluated in more detail.

Air Quality

Conformity Analysis - The DEIS commits to performing a Regional transportation conformity analysis following the selection of a recommended alternative. The conformity analysis should be performed before and included in the Final EIS.

Carbon Monoxide (CO) microscale analysis - The U.S. EPA has identified three types of information that needs to be included in the CO analysis write-up. The areas that require additional information disclosure are in the areas of: (1) fleet makeup, (2) background monitor, and (3) persistence factors.

The DEIS provided information on the makeup of vehicle type used in the microscale analysis. However, the DEIS did not provide information on how these values compare to those used in local area planning and the State Implementation Plan for the Detroit-Ann Arbor area. A short description how these values compare should be provided.

A key component of a Carbon Monoxide (CO) microscale analysis is the background concentration. The DEIS uses background concentrations from the Livonia air monitoring station in the analysis. This monitor is part of the U.S. EPA approved monitoring network. However, the DEIS did not include a rationale as to why data from this monitor was used to establish background concentrations.

U.S. EPA guidance calls for the use of a 0.70 default factor to estimate 8-hour concentrations from 1-hour concentrations unless local air quality monitoring data is used. A description of how MDOT derived the persistence factor equal to 0.60 should be provided.

Air Toxics work - The U.S. EPA is cosponsoring a cooperative effort between Michigan Department of Environmental Quality and Wayne County Department of the Environment, the Detroit Air Toxics Pilot Project, as part of its national air toxics monitoring program. The project is measuring levels of eighteen (18) air toxic compounds, including volatile organic compounds, semi-volatile compounds, carbonyl compounds and trace metals. There is one monitoring location that is near a high-traffic intersection, which will serve as a mobile source oriented site. The project officially started April 19, 2001. Results will be forthcoming from the project on a quarterly basis. Information about the program can be viewed at: <http://www.deq.state.mi.us/ado/eval/amu/pilot.html>. Information from this project should be referenced in subsequent NEPA documentation.

Noise

The DEIS provides little information regarding how the project would be phased in if the Build Alternative was selected for implementation. Plans for the phasing of the project may itself be the cause of significant noise and air quality issues especially if mainline traffic is detoured other local roads. The DEIS makes references to the service drives acting to reduce traffic disruption during

construction of the I-94 mainline. In the scoping document for this project, a reference is made to using the continuous service roads as detours during the construction of I-94. This would have the effect of routing a large amount of interstate traffic at the same level and just adjacent to neighborhoods that meet the definition of environmental justice communities. Noise and other impacts associated with this detour plan should be evaluated. Appropriate mitigation measures should be considered and implemented.

In the discussion of noise impacts, the DEIS discusses FHWA's June 12, 1995 revised guidance on traffic noise analysis. In that guidance, all State I highway agencies were required to adopt written noise policies according to the revised FHWA guidance with respect to cost-per-residence criteria. Those criteria were used to provide a rationale as to why noise walls were not required at two schools. Based on the information provided in the DEIS, it isn't clear if this is an appropriate use of this criteria. Subsequent NEPA documentation should address this point.

Pedestrian and Bicyclist Impacts

A statement was made on page 1-8 of the DEIS that the Build alternative will improve pedestrian access. This is difficult to objectively assess because there is little data presented in the DEIS that discusses the existing pedestrian access. The discussion on pedestrian and bicyclist access topic is limited to page 2-14. The information presented indicates that sidewalks are present along existing service drives but the service drives are not continuous. Some of the pedestrian bridges (used by both pedestrians and bicyclists) are in disrepair. The DEIS did not present information regarding the pedestrian and bicycle access needs in the area. The build alternative would combine vehicular bridges with pedestrian bridges and would eliminate stand-alone pedestrian bridges. The DEIS did not evaluate how these changes would impact pedestrian and bicycle activity in the area. Subsequent NEPA documentation should evaluate these impacts and other community impacts in more detail.

Costs

Cost information is presented in the DEIS in a Table entitled "I-94 Rehabilitation Project Cost Estimates" on page 4-38. The table provides estimated costs for alternatives broken down by construction, right-of-way, design and construction engineering and total. There is little substantiation provided with these estimates. Without providing additional information to support the numbers shown in the table, it is difficult for the reader to compare alternatives on a very important variable. At no place in the DEIS was the matter of maintenance costs discussed. The project being evaluated in this DEIS represents a large investment in highway infrastructure. It would be important to know whether there were significant differences in maintenance costs between the studied alternatives. We recommend that this type of information be included.

Cumulative Impacts

The DEIS includes a section on cumulative impacts starting on page 5-94. The section lists a number of transportation projects that were recently completed or included in the SEMCOG's Transportation Improvement Program (TIP) and the MDOT Five Year Road and Bridge Program. The impacts associated with these projects all appear to be important to include in an cumulative impact analysis. The DEIS does not really include any evidence that a cumulative impact analysis looking at both benefits and adverse impacts was conducted. The cumulative impact section is written as a subjective summary. No analysis has been provided to support the claim that noise, visual quality, economy and pedestrian mobility would be improved or that the cumulative beneficial impacts to the economy and social environment would far exceed the adverse impacts.

Other projects on I-94 and other transportation projects in the area and their impacts should be included in an analysis in the DEIS. Resources and impacts of particular concern to U.S. EPA include: Air Quality, Noise, Impacts to Environmental Justice communities, and land use changes.

SUMMARY OF RATING DEFINITIONS AND FOLLOWUP ACTIONS*

ENVIRONMENTAL IMPACT OF THE ACTION

LO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1540 Policy and Procedures for the Review of Federal Actions Impacting the Environment.

COMMENT BOX COMMENTS

COMMENTS

Public input is very valuable. Please let us know your concerns regarding the I-94 Rehabilitation Project in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before Wednesday, March 21, 2001

I LIVE IN THE 4TH STREET COMMUNITY IN ONE OF THE HOMES WHICH, ACCORDING TO ONE OF THE PROJECTIONS, WOULD BE SLATED FOR DEMOLITION. ALTHOUGH THIS DOES CONCERN ME IMMENSELY, THE MAJOR CONCERN I HAVE IS WHAT THIS PROJECT COULD DO TO ONE OF DETROIT'S LONGEST STANDING SUCCESSFUL COMMUNITIES. THE PROSPECT OF CONVERTING FOURTH STREET TO THE SERVICE DRIVE OF I-94 OR M-10 WOULD CREATE A SITUATION THAT WOULD INCREASE FLOW THROUGH THE RESIDENTIAL STREET MAKING THE SPACE UNSAFE FOR CHILDREN AND ANIMALS, DESTROY THE 20 (+/-) YEAR RUNNING 4TH ST. FAIR, INCREASE CRIME, ETC. AS ONE OF THE (EXTREMELY POLITE AND ACCOMODATING) GENTLEMEN AT

(OPTIONAL)

NAME JOHN EATON
(Please Print)

DATE 03/5/01

ADDRESS 5841 FOURTH ST.

DETROIT MI
CITY STATE

ZIP 48202

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050, Lansing, MI 48909
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

TONIGHT'S MEETING EXPLAINED, THE SERVICE ACCESS WOULD BE MOSTLY FOR TRASH PICKUP, MAIL DELIVERY, ETC. I WOULD THEREFORE RECOMMEND A CUL DE SAC DESIGN MYSELF TO PRESERVE THIS INVALUABLE COMMUNITY.

ALSO, AS AN END NOTE, I WOULD ENCOURAGE THE CITY FATHERS AND PLANNERS TO CONCENTRATE THEIR ENERGIES ON IMPROVING THE LIVES AND LIVELIHOOD OF ITS CITY'S RESIDENTS THEMSELVES. ASK THE QUESTION: DO THE RESIDENTS OF DETROIT REALLY NEED EXPANDED FREEWAYS, CASINOS AND STADIUMS? OR IS THIS A BOWING TO CORPORATE AND MONEY INTERESTS OUTSIDE OF THE CITY? HOW MANY DETROIT RESIDENTS ATTENDED A TIGER'S GAME LAST SEASON? #

I REALIZE THAT THERE IS A NEED TO KEEP THE CITY FUNCTIONING AND THAT TAKES MONEY AND MUCH OF THAT MONEY ARRIVES FROM OUTSIDE THE CITY LIMITS. ALL I ASK — AND I THINK MOST DETROIT RESIDENTS ASK — IS TO IMPROVE OUR LIVING CONDITIONS AS WELL. IMPROVE OUR SCHOOLS AND WORK ON CONTAINING THE ENVIRONMENTAL IMPACT OF AREAS LIKE THE SOUTHWEST SIDE — ONE OF OUR CITY'S MOST VIBRANT COMMUNITIES SLOWLY BEING DESTROYED BY FACTORY EMISSIONS.

THANK YOU FOR YOUR CONCERN AND YOUR TIME.

JOHN EATON

COMMENTS

Public input is very valuable. Please let us know your concerns regarding the proposed re-design of I-94 from I-96 (Jeffries Freeway) to Conner Avenue in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before March 27, 2001.

CONCERNS I HAVE ABOUT THE NEW DESIGN CONCERNS
THE SERVICE DRIVE. OUR STREET IS A DEAD END. THE PROPOSED
SERVICE DR. WILL GIVE ACCESS TO OUR STREET WHICH IS NARROW
AND ONLY WIDE ENOUGH FOR ONE CAR AT A TIME TO PASS. CURRENTLY
THERE ARE BARELY ENOUGH PARKING SPACES. (WE USE CITY-OWNED
LOTS FOR EXTRA PARKING) ALSO, THE STREET NEEDS TO BE
WIDE ENOUGH FOR THE GARBAGE TRUCK TO TURN AROUND.

NAME LAURA BONMARITO DATE 03/05/01
(Please Print)
ADDRESS 5824 FOURTH
CITY DET. STATE MI ZIP 48202

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050, Lansing, MI 48909
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

Open letter to Michigan Department of Transportation

Detroiters don't need wider freeways. We need more and better public transportation. We need bike paths and green areas. We need money spent on our existing parks. We need reasons for people to stay in the city or move to the city, not commute by automobile farther away. We used to have woodlands, wetlands, and farms that everyone could visit only a few minutes from the city. Now we have ugly, treeless, taupe subdivisions. The state allows rich developers to clear land and build these subdivisions without any infrastructure and then use our tax dollars to install new sewers, water lines, and roads. Detroiters don't need our neighborhoods torn apart by freeways anymore than they already have been.

Why not build parks over the freeways as you did for the Jewish community in Oak Park. Tie mexican town back together with a park over the freeway. Tie our Woodbridge community back to the Cass corridor with a park. Tie Boston Edison back together.

Virtually every other large city has some form of light rail, trolley or subway system. The money is there, both federal and state, to come up with an alternative form of transportation. It's time for the state to force SMART and DDOF to merge. It's time for the Big Three to make up for past transgressions. It's time for everyone to work together to build a great public transit system and a better city. Leave our neighborhoods intact.

Thank you.

Bruce Foster

A resident of the Woodbridge Historic Neighborhood

313.831.1607

COMMENTS

Public input is very valuable. Please let us know your concerns regarding the proposed re-design of I-94 from I-96 (Jeffries Freeway) to Conner Avenue in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before March 27, 2001.

Please choose the NO BUILD alternative.

Detroit desperately needs and deserves better public transportation. Like one third of Detroit Residents, my family does not own a car and depends on the often spotty service of DDOT buses. We want our money spent to improve public transit.

It has been demonstrated all over the country that widening highways instead of supporting and creating mass transit just leads to more congestion and the number of people driving increases faster than build plans.

There is Federal money available to help Detroit if we develop a good plan for rapid buses or light rail development. Please invest in our future intelligently, we need good public transit.

NAME Nicole Jean Hartley DATE March 5, 2001
(Please Print)
ADDRESS 6012 Prentiss Apt B4
CITY Detroit STATE MI ZIP 48201

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050, Lansing, MI 48909
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

COMMENTS

Public input is very valuable. Please let us know your concerns regarding the proposed re-design of I-94 from I-96 (Jeffries Freeway) to Conner Avenue in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before March 27, 2001.

I favor the reconstruction of I-94. This will eliminate the left entrance ramp from the Lodge, which is ~~is~~ very dangerous. Also the widening of the expressway is long overdue. I feel that if I-94 is not reconstructed - we risk a very deadly accident on the road due to the deterioration of the pavement & bridges.

NAME Jayne McGee DATE 3-6-01
(Please Print)
ADDRESS 5908 Seneca
CITY Detroit STATE MI ZIP 48213

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
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Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

COMMENTS

Public input is very valuable. Please let us know your concerns regarding the I-94 Rehabilitation Project in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before Wednesday, March 21, 2001

WAYNE STATE UNIVERSITY NEEDS REGARDING I-94 REHABILITATION

Wayne State University has grown a great deal since the I-94 freeway and the Lodge freeway were first built. At that time WSU only occupied the southeast corner of the intersection where the main campus exists today. The majority of the physical education facilities and the soon to be built hockey arena are to the West across the Lodge from the main campus. Many WSU buildings presently exist to the North of the campus across I-94. In addition, the recently announced Wayne State University Research and Technology Park will make the area North of the main campus an even larger portion of the University.

The students, faculty and employees of Wayne State University as well as the residents of the area need and require safe and esthetically pleasing ways of traveling between the various parts of the campus.

To this end Wayne State University requires the expansion of the bridges at Cass and Second over I-94, and Warren over the Lodge to include large park areas on each side similar to but not as large as the Park Plaza Bridges over I-696 in the Oak Park area. In addition the footbridge over the Lodge to the Matthaei Building from the main Campus must not be eliminated, but expanded and improved to make it similar to the Park Plaza Bridges. This is the main line of travel to the West part of the campus from the parking structures and would create a major hardship if it were eliminated.

The chain link fencing used as borders at the edges of the bridges, should be replaced with concrete and brick walls to isolate the bridges and University area from the tremendous noise of the freeways similar to the bridges in Oak Park. Their need is similar to the sound barrier walls being constructed along freeways near housing that is built close to the road. However, Wayne's need is greater due the amount of traffic and the large number of big trucks.

The Park Bridges will do more than make a safer travel situation for those moving around the University. For an area that is very short of green space this will add several acres of parkland.

Sincerely,

Arthur W. Bryant - Wayne State University Alumni Assn. Past President

NAME _____

(Please Print)

DATE 3-5-01

ADDRESS 1811 HOLLYWOOD

CROSSE POINTE WOODS MI

CITY _____ STATE _____

ZIP 48236

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050, Lansing, MI 48909
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

I am in favor of the No-Build Alternative for the I-94 Rehabilitation Project. I believe that the cost, environmental impacts, and residential and business displacement which would result from freeway expansion are far too great. Detroit is already a city which is greatly divided and dominated by its freeways, and any more progress in this direction would seem counterproductive and unnecessary. It seems especially ironic to expand the freeway when $\frac{1}{3}$ of Detroit's residents do not own cars.

What Detroit needs is a comprehensive and effective mass transit system. Expanding the freeways, while taking some of the immediate pressure off of the problem of traffic congestion, will not solve the larger long-term problem of transportation in the region. And the expansion will divert dollars, as well as, and perhaps more importantly, public interest and incentive from the necessity of planning for mass transit.

An improved, high-speed bus system, or a light-rail system, would greatly serve the current and future needs of the city of Detroit. M-DOT would be well advised to ~~put~~ ^{commit} its time, energy, and funding sources whole-heartedly to exploring these options, rather than diverting them into freeway expansion.

Nina M. Eusan
- Nina Marie Eusan
612 Pentis #B4
Detroit, MI 48201
313-832-2769
nina.meu@hotmail.com

**MAILED IN
COMMENTS**

City of Detroit

CITY PLANNING COMMISSION

202 Coleman A. Young Municipal Center
Detroit, Michigan 48226

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Dr. Craig Beverly
Dr. David Cason, Jr., AICP
Thomas Christensen
Robert L. Glenn
John Stater
Kathleen Wendler
Roy Levy Williams

August 13, 2001

Mr. Jose A. Lopez,
Acting Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez:

Attached you will find the recommendations of the Detroit City Planning Commission, as approved on July 5, 2001, regarding the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation of the I-94 Rehabilitation Project. The Detroit City Council requested that this be sent to you, and it is anticipated that the Council will hold a discussion on this matter and possibly pass a separate resolution when the Council returns from recess in September.

Please consider these recommendations when preparing your final design. If you have any questions, you may contact either Mr. Greg Moots or Mr. Marcell Todd of our staff at (313) 224-6225.

Sincerely,



Marsha S. Bruhn, Director

Cc: James Kirschensteiner, Federal Highway Administration
Mr. Winston Stebbins, MDOT Design Division

Arthur Simons
Chairperson
Susan Glaser
Vice-Chairperson

Marsha S. Bruhn, AICP
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Marcus D. Loper
Deputy Director

City of Detroit

CITY PLANNING COMMISSION

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Dr. Creigs Beverly
Dr. David Cason, Jr., AICP
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Robert L. Glenn
John Slater
Kathleen Wendler
Roy Levy Williams

July 27, 2001

HONORABLE CITY COUNCIL

**RE: Proposed Expansion of I-94 Freeway
(RECOMMEND APPROVAL OF ALTERNATIVE PROPOSAL)**

The City Planning Commission (CPC) has reviewed the Draft Environmental Impact Statement (DEIS) prepared by the Michigan Department of Transportation (MDOT) for the proposed expansion of the I-94 Freeway between Connor Rd. and I-96. The primary study area is bounded by 30th street to just east of Conner and a half mile on each side of the existing centerline of I-94. A secondary study area is bounded by an area just west of the city limits to the I-696 interchange in Macomb County. Various groups have raised many questions and concerns about the expansion at public hearings held before City Council and the Commission.

This proposal, referred to as the Build Alternative, represents a very significant expansion of the freeway segment to over 300 feet wide (outside of the interchanges), at a cost of approximately \$1.3 billion. MDOT states in the DEIS that "This proposed project is the first of other I-94 improvement projects in Southeast Michigan", so it seems that this project could set the pattern for the improvements on adjacent segments to the east and west. This adds special importance to the review of this first project, as there seem to be cumulative impacts that are not addressed.

The proposed Build Alternative would provide two additional driving lanes (one in each direction), acceleration/deceleration lanes, continuous three lane service drives on both sides of the freeway, 55 feet of reserved space within the median, an upgrade of the M-10 and I-75 interchanges with continuous service drives, the removal of all left-hand ramps and the reconstruction of existing roadway and bridges.

PUBLIC HEARING RESULTS

On May 17 of this year, the City Planning Commission (CPC) held a public hearing on the above matter. All non-MDOT speakers had serious concerns about the project. Following is a brief summary of the issues raised by members of the public at that hearing.

Draft Environmental Impact Statement (DEIS) Presentation

There were comments that the DEIS prepared by MDOT did not present a neutral assessment of the alternatives, that it reads like a prospectus for the "Build Alternative", the major rebuilding and expansion of the freeway. Comments were made that there does not seem to be enough data to fully compare the three alternatives discussed. There are two much-less costly alternatives presented and then the "quantum leap jump" to a major overhaul of the freeway.

Impact on the Community

There was agreement that I-94 needs to be re-built, including the pavement and many of the bridges. All speakers felt that the proposed expansion is far too wide (the equivalent of 24 lanes, or more than 300 feet). The widening would displace some residents, but if the sections of the freeway to the east and west are expanded to the same degree, there would be extensive displacement of residents and businesses. It was stated that the portion of the City chosen for this first phase (6.7 miles between I-96 and Connor) was chosen because of the low income of its residents and the sparseness of its housing stock.

Questions were raised by Art Center-area residents about how City services would be provided to residents along Hendrie Street, which would become a three-lane service drive. In addition, the Art Center Development Plan shows a landscaped buffer north of Hendrie, rather than the freeway expansion.

Various speakers felt that the widened freeway would create a "Grand Canyon", separating the two sides of the freeway. One said that the "Build Alternative" is overbuilt and delivers a needlessly high level of service at rush hour.

The cost to the City of the "Build Alternative" is between \$30 and \$40 million, and it must be determined where these funds would come from and what other activities would not be funded.

There was a question raised about the number and placement of noise walls. MDOT uses fairly stringent standards when determining where walls can be placed, and there were questions about how the area schools would be shielded.

Health Issues

Some felt that the increased truck traffic that the expansion would attract would lead to increased incidences of asthma along the corridor. Diesel emissions from trucks are a major source of particulate and carcinogens. Detroit children have been found to have three times the national rate of asthma. There were various environmental justice issues raised as well. The 48202 Zip Code that the freeway goes through was identified in a University of Michigan study as a major area in the state for asthma and cancer.

Mass Transit

Many speakers felt that MDOT has not adequately considered mass transit as a complement or even an alternative to the expansion of the freeway. MDOT says that nothing that it is doing precludes mass transit, but it seems to be doing little to encourage it. The DEIS states that there is not enough ridership to support mass transit as an alternative to the widening or enough interest in High Occupancy Vehicle (HOV) lanes to justify their creation. A fifty-five foot wide center median would be reserved for "future use", but speakers commented that is impractical for

use by mass transit because of its short length and the lack of stops within the corridor. It, therefore, seemed likely that the space would be used for a dedicated truck lane, according to some speakers.

There was a comment made that the east-west rail right-of-way north of I-94 that connects to the "Dequindre Cut" would be converted into a roadway to serve the DPW yard at Russell-Ferry, and this would increase the travel time of a Detroit-Pontiac train by lengthening the route.

Several speakers felt that it would be both better and cheaper for the City and its residents to make necessary repairs to the freeway and to construct a commuter rail system linking Detroit to Mt. Clemens, Ann Arbor/Metro Airport, and Pontiac. Ridership on mass transit could eliminate the need for one highway lane. Construction mitigation funds are made available from the federal government as part of its funding of freeway projects, and these funds could be used to provide "seed" money for a mass transit system. It was pointed out that approximately a third of Detroit residents do not have cars and hence would not benefit from the expansion at all.

ANALYSIS

The CPC agrees with some of the hearing speakers that if the Build Alternative were constructed for the entire length of I-94 in the City and the suburbs to the east and west, the impact would be tremendous. There are hundreds, if not thousands, of residents and businesses that would be displaced. This would make certain segments of the project considerably more expensive than what is being proposed now within the study area. In addition, the CPC questions whether suburban communities would support the expansion. If the freeway is not widened for a much longer distance than the 6.7 miles currently proposed, there seems to be limited benefit for having additional traffic lanes and the median within the study area only.

The CPC has reviewed many of the concerns raised at the public hearing and has also reviewed other possible impacts of the proposed Build Alternative plan. While The CPC disagrees with certain features of the proposed Build Alternative, such as its width in the study area, there are still worthwhile elements to consider including continuous service drives, the improvement of freeway interchanges, and increasing peak hour traffic capacity. Furthermore, The CPC contends that if the 55-foot center median were eliminated from consideration, many of the more acceptable features of the proposed Build Alternative could be pursued with minimal or no displacement of homes or businesses.

The following are specific physical modifications the CPC would like to see incorporated in an alternative to the proposed Build Alternative:

Physical and Geometric Improvements

The reconstruction of existing roadway and bridges is recommended for general maintenance purposes that would include the elimination of certain ramps and bridges and the rehabilitation of others. The elimination of the proposed 55-foot center median would allow for the design of additional lanes, auxiliary lanes and continuous service drives without much of the property acquisition as proposed in the Build Alternative. Auxiliary lanes and mainline lanes could be designed closer together and the service drives could be shifted north or south to avoid property acquisition.

The creation of three lane continuous service drives on both sides of the freeway would be beneficial. They would provide an alternative to the freeway if the freeway is congested or closed due to an accident. They would allow people making short trips to use the service drives instead of getting on the freeway and then quickly exiting, needlessly increasing congestion and volume. The CPC is not sure how many vehicles would use the service drives in lieu of I-94, but it is likely that a percentage will use the service drives if travelling only a few miles. The service drives could improve the efficiency of the delivery of City services such as garbage collection, emergency services, transit, etc. MDOT is also proposing the inclusion of six-foot sidewalks along the service drives.

The CPC has found that a continuous service drive could be implemented through a number of property acquisitions, which would involve a relatively small number of residential properties. The existing service drives are generally 30 feet wide inclusive of a parking lane and when abutting residential areas. As such, the CPC finds that three lane continuous service drives are desirable and should be designed to be 30 to 36 feet wide in order to avoid property acquisition as much as possible. Properties that may be relocated include two to three properties located south of Harper at Frontenac and Field.

The CPC suggest that there are several locations where the proposed Build Alternative could be modified to avoid the taking of residential, recreational or commercial property for service drives. When alternatives to the proposed Build Alternative are developed, the CPC would desire to see an alternative that avoids the taking of the following areas:

- along the south side of I-94 between Hamilton and Trumbull;
- along the south side of Antoinette between Third and Cass;
- along the south side of Hendrie between Brush and John R. (the CPC does not object to the existing Wayne County maintenance facility being replaced by a buffer) ;
- one unit of housing in the Fourth and Holden area;
- two properties in the Woodbridge area identified as 5287 Hecla (residential) and 5287 Trumbull (commercial);
- the industrial area north of I-94 between Mt. Elliott and the Conrail Railroad; and
- the residential area north of I-94 between Sheridan and Frontenac.

Two additional driving lanes in each direction would provide an additional capacity of roughly 4,600 vehicles per hour for the freeway, thereby allowing a maximum 13,800 vehicles an hour to use the freeway at any given point. Traffic engineers find that if no major changes were made to I-94 by the year 2015, traffic would have to be reduced by about 30% during the peak hour in order to flow at Level of Service E (that is, when freeway is at capacity with very little gaps in the traffic flow). Some added capacity therefore appears necessary.

The creation of full-width shoulders would allow vehicles to pull completely off the road, increasing safety for those vehicles, people changing tires, and allowing vehicles to use the traffic lanes without having to swerve. We would support one 12-foot wide shoulder in each direction, but are reluctant to support two full-width shoulders in each direction because of the uncertainty of their impact on property acquisition.

The CPC agrees that the interchanges with I-75 and US-10 should be modified to at least remove the left-lane exit ramps and to create the continuous service drives. These modifications will entail significant work but the safety and convenience that results seem to justify these activities. If the right-of-way is not widened as much as MDOT proposes, the acquisitions around the interchanges should be minimized.

There are currently five "left hand" entrance ramps out of the 100 ramps found along the primary and secondary study areas. The removal of all left-hand ramps could reduce the conflict associated with slower traffic merging into what should be the fastest lane of traffic on the freeway. The CPC agrees that the removal of the ramps should enhance safety and increase the capacity of the freeway.

It appears that a solid argument can be made for the addition of acceleration/deceleration lanes between I-96 and I-75. These types of lanes would reduce the swerving or weaving of cars entering and leaving the freeway. Much of the weaving takes place on I-94 between I-96 and I-75 where motorists leave one freeway and must maneuver through short distances along I-94 to enter another. Since there are not many auxiliary or acceleration/deceleration lanes along the existing I-94 freeway, most weaving takes place on the mainline lanes. The ramp to ramp distances are relatively short, ranging from .09 miles to just over .64 miles, making the weaving movements highly turbulent. Entrance and exit ramps would be redesigned to provide sufficient distances between them to meet MDOT design standards. In addition, acceleration/deceleration lanes along the length of the I-94 study area would improve the free flow of traffic allowing motorists more time to maneuver into gaps within the traffic stream.

The CPC is still unclear whether a concept incorporating the various features mentioned above, minus the 55-foot center median, would preclude the need to acquire private property. Based on an analysis of the continuous service drive concept, there appears to be very little residential land needed for the additional roadway alignment. If retaining walls instead of embankments are used, acquisition, though still necessary, should be minimized. There are questions that remain. Can some features of the project be traded off for others? Is it better for the City if an I-94 motorist has access to two 12-foot wide shoulders in each direction at the expense of taking part of a residential lot? Is it more important to preserve aging housing stock for Detroiters or to improve free flow traffic conditions for regional transportation purposes?

Noise

The placement of noise walls is very important to those persons living closest to the freeway. If the freeway is not significantly expanded, it is unlikely that any noise walls would be constructed, since noise would not significantly increase if traffic counts don't. MDOT guidelines call for a maximum cost for barriers of \$30,000/residence, a minimum reduction in noise of 6dBA, and a minimum barrier length of 590 feet.

All but eight of the 63 noise receptor locations monitored along the project area and interchanges exceeded the Noise Abatement Criteria established in Title 23, Code of Federal Regulations, part 772. These receptors included all land uses. Only residences, recreation areas, parks, hotels and motels, schools, churches, libraries and hospitals are eligible for consideration for noise abatement measures. If freeway capacity is expanded, leading to an increase in noise, then the schools along the corridor should be given special attention for noise reduction. MDOT has said that the final determination of how to handle the schools would be made during the design phase of the project, and that they wouldn't be treated as just one residence when calculating the cost/benefit of the barriers.

Additionally, the Commissioners noted that noise violations currently exist on the I-94 freeway. Given the history of noise violations, the Commission recommends that MDOT correct all current noise violations, as well as secure all funding for buffering, construction of walls and maintenance of the buffering and walls, prior to any construction of the freeway. Whatever barriers are required, MDOT must be responsible for financing their construction.

Air Quality/Health

The CPC certainly agrees that it is well-known that an increase in traffic, especially truck traffic, will lead to an increase in vehicle emissions and their attendant negative health impacts. MDOT is correct that cars that are not running efficiently pollute more when crawling in traffic than when they are moving at higher speeds. This means that to reduce emissions on vehicles using I-94, either traffic volume must be reduced or congestion must be reduced. The traffic volume certainly will not be reduced, though mass transit could offer people an alternative to driving. The increase in the average number of people per vehicle would also serve to increase the number of people the freeway can carry without an increase in traffic, and High Occupancy Vehicle (HOV) lanes could encourage people to use this alternative. Unfortunately, Detroit-area residents have shown resistance to carpooling.

For an unknown reason, MDOT chose a Livonia site for its background level when looking at CO concentrations. This site had lower concentrations of CO than the Detroit sites. The Commission members were particularly disturbed that a Livonia site was selected rather than Detroit sites which would seem to be much more relevant. Even with this low background level, however, four of the eight receptor locations are close to exceeding the "Worst Case 8-Hour CO Concentrations". When the higher background level is added, these four locations exceed the eight-hour CO standard.

The CPC feels that the DEIS should discuss whether the proposed project will meet ozone and particulate matter standards. Noting that air quality violations exist at the present time, the Commissioners recommended that MDOT correct all present air quality violations prior to any reconstruction of the freeway.

Mass Transit

The creative use of construction mitigation funds that are made available from the federal government as part of its funding of freeway projects seems to be a very intriguing option to help encourage and possibly fund mass transit as a complement to expansion of the freeway. It must be noted that the funds are a percentage of the total project cost, so as the scale of the project is reduced, the associated construction mitigation funds would also be reduced.

For rail transit, either commuter or light, to be an effective mode of travel, significant changes will have to be made to the region's bus systems. Presently, if a person were to arrive downtown or in the New Center via rail, they would still face barriers to getting from the train station to their final destination.

Possible Future Actions

If the State chooses to pursue the Build Alternative over the objections of the City, there are several ways that the project can be stopped or changed. One is that if SEMCOG does not include the project in its Regional Transportation Plan and Transportation Improvement Plan, the project is not eligible for Federal funding. The City sits on the SEMCOG board, and SEMCOG may not support the project if the City is opposed to the project. Another is that the City's congressional delegation has said that it would not support the federal funding of projects that the local government does not support.

M-DOT will respond to the comments submitted in writing by the City Council in the final EIS. A recommendation of action will then be made. The final recommendation from MDOT may be one or a combination of the three alternatives. The recommendation would then be submitted to the Federal Highway Administration. Upon review and approval, federal monies would then be released for the design.

Environmental Protection Agency (EPA) Review

Subsequent to CPC's recommendation, staff received EPA's review of the DEIS, which is attached for your convenience. That review supports most of the recommendations made by CPC.

RECOMMENDATION

The City Planning Commission does not recommend proceeding with the proposed Build Alternative as presented, but recommends an alternative proposal that would include the following elements:

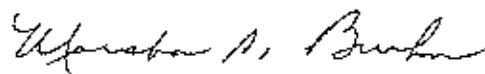
1. Removal of the fifty-five foot wide center median.
2. The addition of lanes (through lanes and/or acceleration/deceleration lanes as needed).
3. The addition of 12 foot wide shoulders on one side only in each direction.
4. The addition of the continuous 30 to 36 feet wide service drives in each direction.
5. In conjunction with the continuous service drive concept, the creation of a street east of Woodward and parallel to the service drive for local traffic to protect the residences along Hendric St.
6. Improvements to the interchanges to, at a minimum, remove the left-lane exit ramps and to create the continuous service drives.
7. Inclusion in the EIS of consideration for the impact of the proposed widening over the entire I-94 corridor from Wyoming to I-696 be prepared.

8. Inclusion in the EIS of consideration for the passenger-carrying capacity of a SpeedLink-style system down Gratiot, Michigan, and Grand River Avenues and rail connections between Detroit and Ann Arbor, Pontiac, Metro Airport, and Mt. Clemens when looking at the necessity for freeway expansion.
9. Inclusion in the EIS for consideration of the Detroit Intermodal Freight Terminal Study's impact on truck traffic on I-94.
10. Reduction in the spacing between the auxiliary lanes and mainline lanes as much as possible and the "tightening" of ramping geometrics in order to limit the taking of private property.
11. Special consideration given to the schools along the corridor for noise mitigation, and that they not be treated as residences in determining if noise barriers are justified.
12. A close examination of using flexible funding/mitigation of construction impacts monies to fund mass transit in the area.
13. That MDOT correct all existing noise and air quality violations prior to any reconstruction of the freeway.
14. That MDOT secure all funding for the barriers--walls, landscaping, buffering, etc.—as well as funding for on-going maintenance of the barriers, before any highway approvals are given.

If the City Council concurs with the Commission's recommendation, the attached resolution is submitted for Your consideration, which, if adopted, would be forwarded to MDOT and other appropriate parties.

Respectfully submitted,

ARTHUR SIMONS, CHAIRPERSON



Marsha S. Bruhn, Director

Gregory Moots, Marcell Todd, and
Robert C. Davis, Staff

Attachment

BY COUNCIL MEMBER _____:

WHEREAS, the Michigan Department of Transportation (MDOT) identified I-94 as the freeway in greatest need for improvement in the 1990 Greater Detroit Area Freeway Rehabilitation Program Study; and

WHEREAS, MDOT subsequently initiated the I-94 Rehabilitation Project focusing on that portion of I-94 between Conner and I-96; and

WHEREAS, MDOT and Federal Highway Administration have prepared and submitted a Draft Environment Impact Statement (DEIS) for this project; and

WHEREAS, the DEIS describes the three (3) alternatives examined and sets forward the "Build Alternative" for consideration; and

WHEREAS, the "Build Alternative" involves a complete reconstruction of the freeway between Connor Rd. and I-96, with the new freeway being substantially wider and costing an estimated \$1.2 billion; and

WHEREAS, the "Build Alternative" would include (in each direction): four traffic lanes, an acceleration/deceleration lane (except within the interchanges), a three lane continuous service drive, and a 54.5 foot wide median reserved for future use, totaling over 300 feet in width; and

WHEREAS, there were areas of concern raised by the City Planning Commission regarding the design of the "Build Alternative", focussing on the center median, the interchanges, and the service drive; and

WHEREAS, concerns were expressed regarding noise impacts of the proposed expansion and the adequacy of noise barriers; and

WHEREAS, concerns were expressed regarding the environmental impacts of the proposed expansion, specifically pertaining to the emissions of trucks, the choice of the background level receptor for projecting CO concentrations, and meeting the ozone and particulate matter standards; and

WHEREAS, the proposed expansion would necessitate the taking of a significant number of properties; and

WHEREAS, there are areas that would be especially impacted by the proposed expansion, including Hendrie Street east of Woodward and the Fourth Street and Holden neighborhoods; and

WHEREAS, mass transit can reduce the number of vehicles using area roads and freeways, including the proposed I-94 expansion and can reduce air pollution through reduced vehicle trips; and

WHEREAS, neither mass transit alternatives nor the funding available for mass transit through federal construction mitigation funds seem to have been fully explored by MDOT as part the DEIS prepared; and

WHEREAS, there are various transit initiatives currently under study that include the Southeast Michigan Council of Governments' (SEMCOG) Metro Airport to Downtown Detroit rail study, CATA's (Capital Area Transit Authority) Lansing to Detroit rail study, the Detroit Regional Chamber's desire to establish with Detroit Renaissance and the Metropolitan Affairs Coalition a regional transit authority (Links) as well as a bus rapid transit system (SpeedLink), and SEMCOG's current efforts to develop a regional vision – for mass transit; and

WHEREAS, transit in this region has for far too long been under-funded, under-implemented and not vigorously sought as one of the solutions to the region's mobility and congestion issues, problems associated with increased growth and development and the social and economic issues facing many of its citizens; and

WHEREAS, near-in suburbs and those lining the highway network are facing the impacts of improvement to that network, necessitated by a decaying and/or inefficient infrastructure, existing traffic congestion and projected future demand; and

WHEREAS, the climate we currently find ourselves in, with so much interest in new and improved transit, seems to present an opportunity for the city and suburbs to finally unite, cross the intrinsic barriers of class, race etc., and pursue and develop a regional transit agenda;

NOW, THEREFORE, BE IT RESOLVED, that the Detroit City Council does not support the proposed Build Alternative as presented, but recommends an alternative that would include the following elements:

1. Removal of the fifty-five foot wide center median.
2. The addition of lanes (through lanes and/or acceleration/deceleration lanes as needed).
3. The addition of 12 foot wide shoulders on one side only in each direction.
4. The addition of the continuous 30 to 36 feet wide service drives in each direction.
5. In conjunction with the continuous service drive concept, the creation of a street east of Woodward and parallel to the service drive for local traffic to protect the residences along Hendrie St.
6. Improvements to the interchanges to, at a minimum, remove the left-lane exit ramps and to create the continuous service drives.

7. Inclusion in the EIS of consideration for the impact of the proposed widening over the entire I-94 corridor from Wyoming to I-696 be prepared.
8. Inclusion in the EIS of consideration for the passenger-carrying capacity of a SpeedLink-style system down Gratiot, Michigan, and Grand River Avenues and rail connections between Detroit and Ann Arbor, Pontiac, Metro Airport, and Mt. Clemens when looking at the necessity for freeway expansion.
9. Inclusion in the EIS for consideration of the Detroit Intermodal Freight Terminal Study's impact on truck traffic on I-94.
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13. That MDOT correct all existing noise and air quality violations prior to any reconstruction of the freeway.
14. That MDOT secure all funding for the barriers--walls, landscaping, buffering, etc.—as well as funding for on-going maintenance of the barriers, before any highway approvals are given.

AND, BE IT FURTHER RESOLVED, that a copy of this resolution and the foregoing report be forwarded to the Michigan Department of Transportation, the Federal Highway Administration, SEMCOG and others as appropriate.



March 27, 2001

Jose A. Lopez, Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

RE: Comments on the Draft Environmental Impact Statement (DEIS) for the I-94 Rehabilitation Project

Dear Mr. Lopez:

The City of Detroit (City) has reviewed the DEIS for the I-94 Rehabilitation Project. We believe the study thus far has addressed many of the issues set forth by the City in the past. The current build alternative addressed our issues regarding reserving space on the freeway for Transit, minimizing the impact on two key neighborhoods and correcting the current design of the M-10 and I-75 interchanges.

We favor moving this alternative forward to the next phase but ask that some additional analysis and refinement address the remaining concerns.

Those concerns are outlined below:

- 1) Vehicular and pedestrian overpasses - more discussion as to the locations and number of overpasses necessary to address access issues for both Pedestrians and Transit.

Criteria for removal of any pedestrian bridges should be evaluated to ensure pedestrian friendly environment. The distance for pedestrians to walk in order to cross the freeway shall be minimized and signalized locations shall be made available for safe pedestrian crossing. The City shall have the option to determine whether removal of a pedestrian bridge for re-locating the pedestrian bridges on a case by case basis during the design phase of the project.

During the early part of the design phase, the City will like to have a list of properties to be acquired for the project for determining impact on the neighborhood.

Brush is currently one way north bound at I-94. The project includes new ramp at brush with an assumption that the Brush street will be modified for two way operation. Further discussion with the City is necessary before final determination is made.



2) Continuous Service Drives - speed and signalization is still a concern.

The additional length of service drives and lanes will require further review with the state to compensate for additional maintenance cost.

The city shall modify the lane usage of service drives as and when necessary.

The addition of a third multipurpose lane is most beneficial if the land strips along service drives are planned for commercial developments.

Any street that is required to be discontinued/cut off from accessing the service drive will be evaluated by City to determine its relevance to safety and geometric issues. This can only be determined during the design phase.

Treatment of the discontinued/cut off streets and alternatives provided to the city to determine the best proposal in minimizing the impact on residences as well as business shall be discussed in detail during design phase of the project. The alternative should also be effective in mitigating the impact on garbage pick-up, snow removal, fire emergency vehicles and delivery services to serve the affected business/residences. Modifications required must be part of the design cost.

3) Maintenance and impact on City facilities and the city's ability to maintain operations before during and after construction.

During re-construction of I-94, accessing major business/traffic generators such as City Airport, Wayne state University, Cultural Center, New Center Area and Downtown should be prioritized to minimize the impact.

Russell Street will be discontinued at I-94, the north bound traffic will be maintained using the proposed new road way (west of Grand Trunk RR), but the south bound traffic will not be able to use the new roadway south of west bound service drive. The southbound surface access will require use of East Grand Blvd/ St. Aubin and loop around I-94 ramp for FWY access. There will be major impact on City facilities which may affect city services to the public. We seek more discussion and perhaps a traffic study and construction plan to determine impacts and mitigation necessary. Also, more discussion on the bypass road proposed to replace Russell Street is necessary. Since Russell Street is a commercial frontage road, alternatives suggested may impact residential property.



4) Retaining walls and noise buffers -additional discussion on the proposed retaining walls and/or noise barriers.

What noise abatement measures will be done for residents that live along areas of the freeway where noise barriers will not be constructed?

5) Other projects underdevelopment or underway how will they be comprehended in the

I-94 Rehabilitation project such as the Intermodal Freight Project or the proposed Light Rail Project from Metropolitan Airport

6) We reviewed the air quality data and put the following question comments.

Why was air quality monitoring data for the project area taken from the Livonia monitoring station? This question was based upon information provided in section 5.5.4.2 "Existing conditions." Tables 5-10 and 5-11 on pages 5-52, 5-53 shows air quality monitoring stations that were located in Detroit, within the project area. More traffic, and therefore, air quality would be impacted there!

Is this project going to remove green space along the side of the freeway, and if so, how will this affect the storm water runoff?

The Air Quality Impacts need to be revised in light of the Courts decision on Ozone (O_3) and Particulate Matter 2.5 microns or smaller ($PM_{2.5}$). Based upon the monitoring data Detroit will be designated non-attainment for Ozone (see attached maps). In addition, the State Implementation Plan (SIP) calls for a reduction in Nitrogen Oxides (NO_x) which may go beyond the reduction in NO_x emissions the Environmental Protection Agency (EPA) is seeking from the Utilities.

The project is required to comply with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos, Code of Federal Regulations, Title 40, Part 61, Subpart M, before preceding with the demolition of acquired commercial, industrial and residential structures part of the project.

How will the proposal address Vehicle Miles Traveled (VMT) and corresponding increase in NO_x ? What NO_x offsets occur as a result of congestion mitigation, if any?

VMT analysis is essential to determine what extra lanes are to be used for. Analysis needs



to be done now or it will never be done.

Southeast Michigan has had (3) three ozone excursions in 1999 and consequently are in maintenance. What measures have been done to assure that the project will not cause future ozone excursions.

Michigan is presently evaluating its NO_x compliance and is developing a SIP to comply. Industries within the Detroit Metropolitan area have been called to examine their contributions to NO_x and negotiate the allowances. What are we doing about mobile sources?

Other issues for further discussion is the potential for the construction of land bridges and the funding. If you would like to discuss these comments further please let me know.

Sincerely,

Stephanie R. Green
Interim Director

SRG/lt

xc: A. Nwankwo
N. Seabrooks
G. Robinson
M. Patel



CITY OF DETROIT
DEPARTMENT OF PUBLIC WORKS
ADMINISTRATIVE DIVISION - DIRECTOR'S OFFICE

COLEMAN A. YOUNG
MUNICIPAL CENTER
2 WOODWARD AVE., SUITE 513
DETROIT, MICHIGAN 48226
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FAX 313-224-1464
WWW.C1.DETROIT.MI.US

March 29, 2001

Jose A. Lopez, Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. BOX 30050
Lansing, Michigan 48909

RE: **Supplemental** to comments on the Draft Environmental Impact Statement (DEIS) for I-94 Rehabilitation Project

Dear Mr. Lopez:

Please find below the supplement to our comments submitted to you on March 27, 2001. These comments are in detail concerning transit issues from the Detroit Department of Transportation.

Comments

DDOT staff has completed its review and submits the following comments as it relates to the above referenced project. It is my understanding that concerns expressed by DDOT at meetings held in 1999 and 2000 focused on the issue of bridge removal and its impact on DDOT bus operations (miles and costs), pedestrian access to bus stops and service drive capacities. Today's draft document, though more detailed as it relates to service drive capacities provides no specifics on proposed bridge removal, except for on Cadillac. Therefore, it is impossible to site specifics other than the Cadillac Bridge in our comments on this matter. Enclosed is preliminary information on the project's impacts (eg. bridges DDOT currently uses for north/south access).

Removal of the Cadillac Bridge will impact three (3) routes: #7 Cadillac, #11 Clairmount and #34 Gratiot. We believe it will also impact some service provided by SMART. Both revenue and deadhead mileage will increase on the Cadillac and Gratiot routes, respectively.

Although the narrative found on Page 4-31 discusses DDOT service and the Cadillac Bridge removal, there is no discussion of anticipated turning modifications to existing traffic movements. Northbound turning movements from Gratiot to westbound Harper are currently prohibited. If no modifications are made nor anticipated by the planners of this project, then DDOT will also lose access to a significant transfer stop at Gratiot and Harper, inconvenience customers or worse lose ridership. Our projected annual mileage increase and cost for this one (1) bridge removal is not available at this time.



DDOT currently uses freeway bridge access on:

Conner

Conner
Van Dyke
Chene

Cadillac

Cadillac
Clairmount
Gratiot

Van Dyke

Van Dyke

Mt. Elliott

Conant

Chene

Chene
Grand Belt

Beaubien

Oakland

Woodward

Woodward

Not knowing which of these may be recommended for removal does not allow for adequate review and comment. Each of these routes operate within the scope of a specific number of trips. The total miles and hours for these trips will be impacted due to not only any bridge elimination but overall shutdown of the freeway. Re-routes will be necessary. Over a period of months this will result in a substantial increase to DDOT's operating costs. I strongly request that means to mitigate these costs be sought during negotiations with MDOT to lessen the budgetary impact on the City.

North/south access by pedestrians to bus stops, even if bus routes utilize the continuous service drive concept is critical. Every two (2) miles may not be adequate for densely populated areas or generators of service demand. Careful consideration of pedestrian needs must remain a high priority in design.

Development of the continuous service drive at this point could be of benefit, particularly if signalization improvements are made. The key success to this still remains retaining access by pedestrians from the adjoining neighborhoods.

Again, we are very pleased to see the inclusion of a dedicated lane of service to accommodate various modes of transportation. However, we are concerned though that the answer to roadway



I-94 REHABILITATION PROJECT

DDOT Routes In Revenue Service Impacted By Freeway Reconstruction

Grand River
Fenkell
Linwood
Hamilton
Dexter
Woodward
Medical Center Shuttle
Oakland
Chene
Clairmount
Conant
Van Dyke
Gratiot
Cadillac Harper
Conner
Grand Belt
* Russell
* Imperial
* Plymouth

* Revenue service that travels under the freeway



Jose Lopez
Supplemental I-94 Rehabilitation Project
March 29, 2001
Page 3

congestion is "adding lanes" for general use, which appears to be the approach for this project. Although Page 4-17 indicates that "reserved space in the median could be used for transit" it goes further to state that "transit is currently not considered for implementation as part of the project". Why not? The study also indicates that HOV lanes are not feasible. If not HOV use nor transit, then what will be the "use" (multi-use) of the lane? I am requesting that the title might be revised to read "Public Transportation/High Occupancy Vehicle Lane" to remove confusion and doubts about its use as a possible commercial carrier lane or single occupancy vehicle lane.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie R. Green".

Stephanie R. Green
Interim Director

SRG/lt

xc: A. Nwankwo
N. Seabrooks
G. Robinson
M. Patel
C. Gibbons-Allen

MAYOR
CHARLES G. GOEDERT

CITY COUNCIL
CRAIG COVEY
ROBERT G. PORTER
JONATHAN M. WARSHAY
HELEN MARIE WEBER

CITY MANAGER
THOMAS W. BARWIN

CITY OF FERNDALE

300 EAST NINE MILE ROAD
FERNDALE, MICHIGAN 48220-1797
TELEPHONE: (248) 546-2360
ferndale-mi.com



"GOOD
NEIGHBORS"

March 28, 2001

Mr. Jose A. Lopez, Public Hearings Officer
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Lopez:

Enclosed is a Resolution passed by the Ferndale City Council on Monday, March 26, 2001 expressing strong opposition to the \$1.3 billion I-94 expansion in Wayne County. Council has also asked for a 180-day extension of the public input process on this proposed project.

In summary, we believe the project is too large, too costly, and will be a detriment to regional and community development as planned. It is our Community's strong feeling that these major and costly road improvements cannot continue to go on without any coordination with the regional public transportation planning process now underway through the offices of SEMCOG.

We are hopeful that our Resolution will be given serious consideration by the parties involved in the transportation decision making process. The size and scope of the I-94, I-75, I-375 and other southeast road expansion projects are among the most important and capital intensive decisions that will dictate our region's future quality of life for generations to come.

Sincerely,

Thomas W. Barwin
City Manager

TWB/saa

Enclosure

CITY OF FERNDALE

RESOLUTION

Opposing \$1.3 Billion I-94 Expansion Plan Request Extension of Public Comment Period

Moved by Councilman Warshay, seconded by Councilman Covey, to adopt the following Resolution:

Transportation planning decisions are among the most important decisions our system of Federal, State and Local governments collectively make on behalf of our communities; and

Sound transportation planning procedures should also encourage input on transportation planning strategies and decisions from the general public and local governments impacted by those decisions, as transportation decisions are vital to a community's environment, quality of life and economy; and

The costs of transportation systems represent a significant portion of federal, state and local budgets and directly and indirectly dictate the future growth, investment and development patterns and quality-of-life viability of a region impacted by important transportation decisions and subsequent investments, and also to be noted is that personal transportation costs average 18% of a family's income, second only to housing costs; and

For these reasons, the City Council of the City of Ferndale, Michigan requests that the period for essential public comment on the I-94 expansion plan be extended by 180 days to allow for additional public and local government input and to allow for planning the future of I-94 in conjunction with SEMCOG's regional public transportation planning process now underway and scheduled to be completed no later than October 2001; and

With the current public input period now scheduled to end on March 27, 2001, the City of Ferndale objects to the \$1.3 billion I-94 expansion plan for the following reasons:

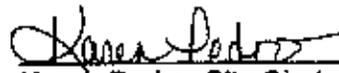
- 1) The current plan to expand a six mile span of I-94 at a cost of \$1.3 billion to enlarge the segment to a 20-lane configuration is financially and spatially exorbitant; and
- 2) The failure to coordinate the \$1.3 billion road investment with any current or ongoing public transportation alternatives is shortsighted, poor public policy and likely to result in a tremendous waste of taxpayer resources; and
- 3) The current I-94 plan will add significantly to the noise, air and storm water pollution in the immediate vicinity of the roadway, aggravating the health of a community where its children suffers from asthma rates at three times the national average, and billions in Great Lakes water quality improvement mandates; and

- 4) The current I-94 plan will aggravate urban sprawl, disinvestment from the central city and older suburbs, and does nothing to help those who may not have private transportation options, specifically low and moderate income individuals, the disabled, elderly and youth to get to employment, medical, educational, recreational or entertainment centers; and
- 5) The current plan does not meet any desirable regional aesthetic, community or neighborhood revitalization goals and will further divide communities and continue the practices which have made Metro-Detroit one of the most racially and economically segregated regions in America; and
- 6) The current plan will likely drain resources from improving other methods and alternative routes for moving goods and commerce; and
- 7) From City Council's experience in Ferndale, studies, and visits to other vibrant Metropolitan areas in North America, we truly believe that less expensive, faster, cleaner and fairer alternatives could be designed and implemented more aligned with the environmental, economic, quality of life and community improvement goals and vision that a growing coalition of Metro-Detroit citizens share; and
- 8) The current I-94 plan and Southeast Michigan's current transportation strategy works against our national, state and local interest by continuing to increase our dependence on mid-east oil, at a time when sound public policy dictates that public investments provide reliable mass transit backbones in urban areas, which lessen our dependence on mid-east oil and gas.

Therefore, we the City Council of the City of Ferndale, voice our opposition to the I-94 expansion plan and direct City staff to forward a copy of this Resolution to the Federal Highway Administration, the Michigan Department of Transportation, SEMCOG, Governor John Engler, the City of Detroit, United States Senator Carl Levin, United States Senator Debbie Stabenow, Congressman Sander Levin, the Environmental Protection Agency, the Michigan Department of Environmental Quality, State Representative Gilda Jacobs, State Senator Shirley Johnson, MOSES, TRU and other interested local governments.

AYES: Council Members Covey, Porter, Warshay, Weber; Mayor Goedert
NAYS: None
ABSENT: None
MOTION CARRIED

I, Karen Pedro, City Clerk of the City of Ferndale, do hereby certify that the foregoing is a true and compared copy of a Resolution duly made and passed by the Ferndale City Council at a meeting held March 28, 2001.



Karen Pedro, City Clerk

MAYOR
CHARLES G. GOEDERT

CITY OF FERNDALE

300 EAST NINE MILE ROAD
FERNDALE, MICHIGAN 48220-1797
TELEPHONE: (248) 546-2360



"GOOD
NEIGHBORS"

CITY MANAGER
THOMAS W. BARWIN

ferndale-mi.com

March 28, 2001

TO: Senator Carl Levin
Senator Debbie Stabenow
Representative Sander Levin
Representative David Bonior
Governor John Engler
Mayor Dennis Archer, City of Detroit
Gil Hill, President, Detroit City Council
Christine Whittman, United States Environmental Protection Authority
Michigan Department of Environmental Quality
Fred Skaer, Federal Highway Administration
Jose Lopez, MDOT
Paul Tait, SEMCOG
State Senator Shirley Johnson
State Representative Gilda Jacobs
Dick Blouse, Greater Detroit Chamber of Commerce
Vicki Kovari, MOSES
Karen Kendrick-Hands, TRU

FROM: Thomas W. Barwin, City Manager 

SUBJECT: Proposed \$1.3 Billion I-94 Expansion, Transportation Planning

Mayor Charles Goedert and the Ferndale City Council have asked that I forward to you the enclosed Resolution adopted March 26, 2001. City Council, a growing coalition of organizations, churches and individuals in our area and I are strongly opposed to the proposed \$1.3 billion plan to expand a 6.7 mile stretch of I-94 in Wayne County, and related billion dollar road expansion projects.

In summary, these plans are too large, too costly, are not coordinated with any regional mass transit plan and most importantly, will be a detriment to the quality of life in the region, while missing great community building opportunities. We are hopeful that our Resolution will be given serious consideration by all parties involved in Southeast Michigan's transportation decision-making process.

Thank you for your interest and support on these vital transportation issues. We deeply appreciate any help and support you can provide toward restoring economic, social and physical vibrancy to Southeast Michigan and our urban areas.

TWB/saa

Enclosure

THURSDAY, MARCH 22, 2001

MR. JOSE LOPEZ
MDOT PUBLIC HEARING OFFICE
P.O. BOX 30050 LANSING, MI 48909

DEAR MR. LOPEZ,

I THOROUGHLY AGREE WITH MS. KAREN KENDRICK-HANDS
ARTICLE IN THE MAR. 19, 2001 ISSUE OF THE FREE PRESS.
THE INTERSTATES HAVE BECOME THE PRIVATE DOMAIN
OF TRUCKING COMPANY INTERESTS.

MY WIFE AND I RECENTLY COMPLETED A 4000 MILE
MOTOR TRIP TO FLORIDA AND BACK. IT WAS VERY STRESS-
FUL TO SAY THE LEAST. THE PASSENGER CAR CAN IN NO WAY
COMPLETE WITH THE MODERN DAY TRUCK-TRACTOR WITH
TRAILER (SOMETIMES TWO). THE MODERN KENWORTH, PETERBILT,
VOLVO, FREIGHTLINER IS HUGE. AND THEY ARE POWERFUL.
THESE TRUCKS EASILY GO 90 M.P.H. (COMMON IN TENNESSEE)
AND THEY ROUTINELY PASS OTHER VEHICLES GOING UPHILL.

YES, HIGHWAYS HAVE BEEN IMPROVED BUT THE
TRUCKS HAVE NULLIFIED ANY IMPROVEMENTS
DERIVED.

PLEASE DON'T EXPAND THE HIGHWAY SYSTEM - THE
TRUCKS JUST TAKE OVER - WHAT ABOUT THE PASSENGER CAR?

Shanoski
Alex E. Shanoski

Helen & Alex E. Shanoski
20448 Woodland
Harper Woods, MI 48225



University Cultural Center Association

David Mackenzie House • 4735 Cass Avenue • Detroit, Michigan 48202 • (313) 577-5088 • FAX (313) 577-3333

March 26, 2001

Jose Lopez, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez,

The University Cultural Center Association (UCCA) is pleased to express its support for the I-94 Rehabilitation Project Build Alternative.

UCCA staff and several members have reviewed the plans as they have developed over the past five years. We are aware of and appreciate the efforts that the I-94 design team has made to integrate the concerns of the Cultural Center institutions. At this time we feel that the Build Alternative design best reflects a compromise between the public's concerns and that which meets current highway standards.

We would strongly encourage MDOT to incorporate pedestrian-friendly enhancements to the overpass bridges wherever possible. We are particularly interested in seeing wide sidewalks, pedestrian lighting and some landscaping on the Cass, Woodward and Brush bridges over I-94. In addition, we would request that the pedestrian bridge over the Lodge, just north of Warren, remain available to the thousands of students using it to reach the main campus from parking and athletic facilities.

The UCCA is glad to see this long-anticipated project reach a decisive point. We hope that the I-94 Rehabilitation team will be able to move to the next phase of the project so all will benefit from these much needed improvements.

Sincerely,

Susan T. Mosey
President



University Cultural Center Association

David Mackenzie House • 4735 Cass Avenue • Detroit, Michigan 48202 • (313) 577-5088 • FAX (313) 577-3332

March 26 2001

Jose Lopez, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

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The UCCA is glad to see this long-anticipated project reach a decisive point. We hope that the I-94 Rehabilitation team will be able to move to the next phase of the project so all will benefit from these much needed improvements.

Sincerely,

Susan T. Mosey
President

ORIGINAL COPY IN MAIL



L A W O F F I C E O F
MYCKOWIAK ASSOCIATES

A PROFESSIONAL CORPORATION

1724 FORD BUILDING
DETROIT, MICHIGAN 48224

VICK: MYCKOWIAK
MICHAEL E. MYCKOWIAK

TELEPHONE 313 963 1002
FACSIMILE 313 962 3779

March 21, 2001

José A. López,
Public Hearings Officer
MICHIGAN DEPARTMENT
OF TRANSPORTATION
P.O. Box 30050
Lansing, Michigan 48909

RE: Public comment submission -- I-94 expansion

Dear Mr. López:

I am writing to urge that MDOT reconsider and change its enormously wasteful plans for "upgrading" I-94 in Detroit.

While the stretch of expressway at issue obviously needs resurfacing, there exists no rational need for a vast expansion of traffic capacity. The cost to Michigan and the Detroit community in public funds, pollution and neighborhood destruction far outweighs the benefit that will be enjoyed mostly by out-of-state trucking firms and suburban commuters. MDOT's plan is shaping up as a waste and boondoggle on a scale perhaps second only to Boston's Big Dig. More capacity is not the answer.

Since the inception of the interstate freeway system, MDOT has planned and built as if citizens have some sort of constitutional right to travel the system at 70 miles per hour regardless of the time of day or location. This practice has resulted in some of the worst sprawl in the country and a shameful absence of decent mass transit in the Detroit area. The practice has to stop immediately.

For a tiny fraction of the cost of the planned expansion, the MDOT could employ a full-time fleet of emergency assistance vans and tow trucks 24 hours a day to remove broken-down vehicles from the shoulder. This would eliminate a huge cause of the congestion experienced on that section of I-94 prior to the present where congestion is now caused by the bridge reconstruction work. While the current

José A. López
MDOT
March 21, 2001
Page 2

capacity of the road may not allow for maximum speed during peak travel time, -- big deal. Detroit is a big city, congestion happens.

Many other urban areas perceived as more livable and more desirable than Detroit are actually rejecting additional freeway capacity. Milwaukee, Cincinnati, Louisville, Portland, Oregon, and Oakland California come to mind.

MDOT must stop serving as a conduit for what amounts to a transfer of wealth to trucking firms and road construction companies. It must also stop being a facilitator of 100 mile per day roundtrip commutes in single-rider automobiles for middle and upper-middle class workers.

MDOT should be at the forefront of smart growth solutions for Detroit and Michigan. Instead it often serves as the largest obstacle. More rational solutions exist for the I-94 repair. Don't waste \$1 billion of taxpayer money.

Very truly yours,

MYCKOWIAK ASSOCIATES, P.C.



Michael E. Myckowiak

MEM/em

cc: Senator Carl Levin
Senator Debbie Stabenow
Congresswoman Carolyn C. Kilpatrick
Senator Joe Young, Jr.
Representative Hansen Clarke

Gene Lopez
MDOT Public Hearing Office
P. O. Box 30050
Lansing, MI
48909

Dear Mr Lopez,

Please register my comment regarding I-94. As a regular driver on this freeway, I know it needs improvement: on the surface, an additional lane, better ingress & egress. However, more and more freeway building is destructive to our community, our environment & our future. We need more and better mass transit and real walkable and bikeable pathways. A monster I-94 for trucks does neither of these.

Sincerely,

1542 Hubbard St. Shaun S Webbercott

15730 Middlebury Drive
Dearborn, Michigan 48120
March 20, 2001

Jose Lopez
MDOT Public Hearing Office
P.O. Box 30050
Lansing, Michigan 48909

As a retired freeway planning engineer for the City of Detroit, and still resident of the Metropolitan Area, I wish to protest the MDOT proposal to "upgrade" the I-94 freeway between Conner Ave. and I-96. "Upgrade" in this context means a complete rebuild and widening at a cost of \$1.3 billion.

About 30 years ago the City of Detroit and MDOT developed a master plan of freeways which included an extension of the Davison Freeway to connect with I-96 to the west, and to Conner and I-94 to the east. The state also had plans to extend the M-53 Freeway along Mound Road to Davison. The "dual - dual" section of I-96 east of Telegraph Road and the full freeway type of interchange at Mound Road and I-96 were built according to this plan. Public opinion turned against freeways in urban areas in the 1970's and Mayor Coleman Young said "no more freeway in Detroit" so these vital links in the system were never built.

If the state thinks it can raise \$1.3 billion for "upgrading" I-94, with all the havoc that would cause, it should study the feasibility of completing the missing links of a real system.

This system would be attractive to truckers and greatly relieve traffic on I-94.

Very truly yours,
Stewart M. Gourlay

cc Karen Kendricks-Hands
kdkhands@voyager.net

10065 Kingston
Huntington Woods, MI 48070

March 21, 2001

Jose Lopez
MDOT Public Hearing Office
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez,

I am writing to urge MDOT to shelve the widening of I-94, and use all of the 1.3 billion dollars for bike paths, sidewalks, tree-planting, litter clean-up, sanitation services, and state-of-the-art public transportation systems.

Too much of Detroit is covered with concrete already. That's why so many people moved to the suburbs. Detroit is too good to trash and throw away by piling on more pavement. The city needs to preserve, recover and acquire as much green space as possible. Don't give it away to trucks and cars that pass through and only leave behind their fumes.

I beg you to make MDOT work for the citizens of Detroit and its inner-ring suburbs. About a third of the people here, myself included, either can't afford to drive or choose not to. Many of us suffer from asthma, headaches, and other health problems due to poor air quality from too many vehicles and not enough greenery. Asthma is especially serious among Detroit's children; it's the number one cause of their hospitalization and school absenteeism.

The people in this area desperately need public transportation which is safe, clean, quick and reliable, above and beyond any more freeway work. Anyone who thinks drivers have it bad should try waiting for a bus that may or may not come, on a busy corner without shelter, exposed to all kinds of weather and traffic, and then (assuming the bus comes) having to stand all the way because there are no seats left, and then having to walk along the grey concrete roads and streets to get a transfer.

Detroit can't afford to pour 1.3 billion dollars into more concrete to enable our addiction to big oil. Instead of designing bigger freeways, MDOT should be figuring out how to make the existing ones smaller. Remember: "The road is wide that leads to destruction."

Sincerely,

Cadey Sontag

March 19, 2001

Mr. Jose Lopez
Public Hearings Officer
Bureau of Transportation Planning,
Michigan Dept. of Transportation
P.O. Box 30050
Lansing, MI 48909

SUBJECT: COMMENTS - I-94 REHABILITATION PROJECT
Whiting Distribution Services, Inc.

Dear Mr. Lopez:

Whiting Distribution Services (WDS) has participated in the public hearings on this proposed project since 1996, and has continuing concern over the likely permanent loss of truck access to its business under the "Build Alternative". Such an action would create severe short- and long-term economic consequences which are not currently reflected in the Draft Environmental Impact Statement (EIS) and Section 4(f) Evaluation Summary. Refer to earlier comments dated 9/22/97 and 3/19/96,

BACKGROUND: WDS has been a Detroit public warehousing and distribution company for over 40 years. The potentially-impacted facility, located at 5470 Hecla Ave, is the second largest industrial/commercial business along the proposed rehabilitation corridor. WDS provides Just-In-Time supply services to the Big Three and many of their Tier I and Tier II suppliers throughout the U.S. and Canada. This facility is a key provider of time-critical and temperature-sensitive products. This site is highly dependant on over-the-road truck access.

Over the past 10 years WDS has invested over \$3 million on this site and created over 20 permanent jobs to the local economy. Plans to construct additional facilities onsite with an estimated doubling of full time jobs were delayed in 1997, pending a decision on the I-94 rehabilitation and site access (see letter to Mr. Jeff Saxby on September 22, 1997). WDS sincerely intends to stay in Detroit and grow, but cannot do so unless site access for trucks is fully addressed.

CONCERN: The proposed "Build Alternative" would eliminate the frontage road on site, thereby eliminating any truck access to approximately 2/3 of the building, making 163,000 square feet unuseable for daily shipping and receiving. While the MDOT "Build Alternative" does not

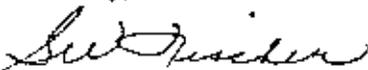
appear to disturb any building on site, the inability to access this building effectively nullifies any practical use. In an April 5, 2000 meeting on site with Mr. Saxby, potential site access options were discussed. These options will require structural changes to the existing site to enable truck access, if the "Build Alternative" were enacted.

IMPACTS: If the proposed Build Alternative goes forward, there will be economic and business impacts that are not reflected in the Draft EIS. These include:

1. Permanent removal of commercial truck access to a business is effectively the same as displacing this business. If alternative access is feasible, such costs should be included in the MDOT model and economic impact. If alternative access is not feasible, displacement costs should be included in the EIS.
2. (Assuming alternative access is feasible) Due to the time-critical and temperature sensitive nature of activities, utility interruption could have a devastating effect on this business. Arrangements for temporary utilities will be necessary to maintain ongoing operations, and costs for such should be included in the economic impact.
3. (Assuming alternative access is feasible) Truck "staging" currently occurs along the frontage roadway proposed to be removed. As a critical element of just-in-time operations, arrangements to create other "staging" areas will require site modifications which should be included in the economic impact.
4. (Assuming alternative access is feasible) Traffic interruption due to limited site access by trucks during I-94 construction is a certain reality. In a business where goods are contracted to be delivered within an hour or two of order placement, the potential for interruption and delivery failure is high. Due to the many low-clearance underpasses in the vicinity, several traffic contingencies need to be developed, implemented and included in the EIS to assure uninterrupted commerce.
5. Planned expansion on site has been curtailed pending an MDOT final design. Any temporary or long-term I-94 modifications should account for planned expansions to enable optimized traffic flows, public safety and local industrial/commercial growth.

As our 40 years of business hinge on this project, Whiting is committed to ongoing discussions to assist MDOT accomplish roadway improvements, while preserving jobs and commerce in Detroit.

Sincerely,



Gary W. Fischer
Whiting Distribution Services, Inc.
5470 Hecla Ave, Detroit 48208

ACCESS

Arab Community Center for Economic and Social Services
المركز العربي للخدمات الاقتصادية والاجتماعية

March 19, 2001

Jose A. Lopez
Public Hearings Officer
Michigan Department of Transportation
P.O. Box 30050
Lansing MI 48909

Dear Mr. Lopez:

I am writing to express my opposition to MDOT's proposed plan to expand I-94. *Without a doubt, I-94 needs repair*, but it's overkill to expand it to 20 lanes and spend \$1.3 billion of taxpayers money in the process.

MDOT's proposed alternative on the I-94 project would waste enormous amounts of money for a project that will excessively affect minority communities, destroy homes, further divide neighborhoods, and negatively affect the City's vitality.

Increased truck and car pollution will contribute to health problems and increase asthma, cancer and premature death, associated with such pollution. Detroit's children suffer from asthma at three times the national average! Increased noise will also be a problem for homes surrounding this massive project.

We want to depend on our public servants to make efficient use of our tax dollars and to protect the interests and welfare of the public. This project does neither. It excessively burdens minority communities, which is inconsistent with Federal Executive Order 12898 on Environmental Justice.

Southeastern Michigan, and particularly the City of Detroit, needs reliable, effective, clean transportation alternatives, that enhance the capacity of all citizens to get where they need to go. Detroiters desperately need excellent, well-maintained freeways, and better public transportation options. Without this, Detroit (and by extension, the Southeastern Michigan region) will never become the "world class city" it seeks to become.

We need more balanced transportation solutions that do not waste taxpayers' money, and that *benefit*, rather than harm, our cities and minority communities. Instead of a massive paving project, MDOT should focus on fixing I-94 first, and building our capacity through transit and rail improvements.

Sincerely,



Kathryn Savoie, Ph.D.
Environmental Program Director

Administrative
Center
2651 Saulino Court
Dearborn, MI 48120
(313) 842-7010
Fax: (313) 842-5150

One-Stop Employment &
Human Services Center
6451 Schaefer Road
Dearborn, MI 48126
(313) 945-8380
Fax 1: (313) 624-9418
Fax 2: (313) 624-9417
Fax 3: (313) 846-4719

Family Counseling
Center
2601 Saulino Court
Dearborn, MI 48120
(313) 843-2844
Fax: (313) 843-0097

Community Health Center
MEDICAL CARE DIVISION
9708 Dix Avenue
Dearborn, MI 48120
(313) 842-0700
Fax: (313) 843-6340

Community Health Center
HEALTH EDUCATION &
RESEARCH DEPARTMENT
10140 West Vernor
Dearborn, MI 48120
(313) 842-5201
Fax: (313) 842-5490



19 March 2001

Jose Lopez
MDOT Public Hearing Office
P.O. Box 30050
Lansing, MI 48909

I am writing to register my strong support for the MDOT proposal to improve I-94 from Conner Avenue to I-96 in the City of Detroit. This project is long overdue; as I have read about the proposals (most recently in Detroit Free Press, March 19, 2001, p. 11A) this type of construction is badly needed. If anything the current MDOT proposals may not be large enough.

I have driven many miles of 8, 10, 12 lane freeways in the Los Angeles area. We need freeways like that in Michigan. I have also driven the "double deck" freeways in San Francisco and Texas and the "tunnel" freeways in Boston. If land acquisition costs become too high, double decking ~~is~~ may be necessary here.

In the 1940's and 1950's six lanes seemed like enough for many years, but I-94 was inadequate on the day it was opened! We need to build for the future, not some dream for the past.

John Potter

GEORGE REED
13448 HASSE
DETROIT MI 48212
MARCH 5, 2001

MR JOSE LOPEZ
PUBLIC HEARING OFFICER
MICHIGAN DEPARTMENT OF TRANSPORTATION
P.O. BOX 30050
LANSING MI 48909

I support
MOOT'S plans for widening F-94
in Detroit. I am not
able to attend the public
hearings for this project because
of my work schedule.

Please send additional
information on this project. Gratefully
George Reed

March 27, 2001

Peter D. Warner
856 Westchester
Grosse Pointe Park MI
48230

Mr. Jose Lopez
Public Hearing Officer, PDB30050

Dear Mr. Lopez.

I am opposed to the widening of
I-94 Highway Project.

I suggest that the Public
Hearing Committee consider the
Plan which called for connecting
the existing and newly widened
Darison expressway with I-96
on the West and Connor on the
East and connecting the newly
widened Connor to I-94.

This plan would add a parallel
Expressway to I-94 at a much
reduced cost.

Yours truly

Peter D. Warner

Robert A. Sundholm
805 E. Filer
Ludington, Michigan 49431

March 26, 2001

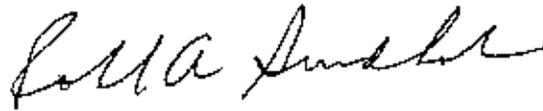
Dear Mr. Lopez,

I am in strong opposition to spending more money on I 94 which as I see it will be at the expense of public transportation around the State.

We in the rural counties are in dire need of improved public transit and feel that MDOT should be helping us rather than adding to the congestion in the SE Michigan area.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert A. Sundholm".

3/25/01

Dear Jose Lopez,

I am writing to you regarding the proposed I-94 expansion project in Detroit. I am opposed to this project and its extreme cost. The money should be used to create and improve mass transit in Detroit for people, not for goods. By mass transit I mean light rail service and passenger rail service in the Detroit metropolitan area. We do not need more highways or highway lanes. Repair I-94, yes. Build rail lines, yes. Build more highway lanes, no. We need metropolitan Detroit rail service. The money can also be used to renovate the Detroit, Michigan Central Railway Terminal. As the Union Rail Building in Washington D.C. was renovated.

BRIAN D. MCATAMNEY
9780 SILVERSIDE
SOUTH LYON, MI. 48178-8811

Thanks
Mr. Brian D. McAtamney



MICHIGAN ASSOCIATION OF RAILROAD PASSENGERS, INC.

a non-profit Michigan corporation founded in 1973
advocating improved intercity and metropolitan rail passenger services

P.O. Box 594 • St. Clair Shores, MI 48080-0594

March 2, 2001

Mr. James J. Steele, Division Administrator
Federal Highway Administration
315 West Allegan, Room 211
Lansing, MI 48933

RE: Draft Environmental Impact Statement on the I-94 Rehabilitation Project; Detroit, MI

Dear Mr. Steele:

Due to the apparent lack of sufficient notice and the complexity of environmental issues raised, we are requesting an extension of the public comment period. This will permit a focused review of issues including long-term air quality impact on adjoining neighborhoods, increased vehicle congestion at transportation generators and the negative affect on developing a variety of appropriate public transportation alternatives.

Thank you for your time and consideration of this critical issue.

Sincerely,

Timothy D. Backhurst, Chairperson
Michigan Association of Railroad Passengers

CC: Fred Skaer, Director (HEPN-1)
Office of National Environmental Policy Act Facilitation
Federal Highway Administration; Washington, DC

Jose A. Lopez, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation

Karen D. Kendrick-Hands, J.D.

John DeLora, Executive Director, Michigan Association of Railroad Passengers

April 7, 2001

Adiele Nwankwo, Project Manager
Parsons Brinkerhoff Michigan, Inc.
535 Griswold Street, Buhl Building; Suite 1940
Detroit, Michigan 48226

RECEIVED

APR 10 2001

PARSONS BRINKERHOFF
DETROIT, MI

I live in the Woodbridge neighborhood and have been looking forward to a rebuilt I-94 for some time. I-94 seems to be perpetually under construction and I was looking forward to the day when it would be open on weekends and provide a less jarring ride.

After reading that the project was delayed for further public comment, I finally decided to check the I-94 project website last night. Much to my surprise, I discovered that I must now write this letter of opposition to the project.

The excellent website very effectively demonstrated to me that the project will harm the quality of life for residents of this area. People live in cities because there is a special feeling in closely-knit communities that are densely packed and full of unusual buildings and corners. In every successful large city, old neighborhoods are preserved and cherished. This can be seen in Chicago, New York, Canada and anywhere in Europe. In those places historic structures and neighborhoods are preserved at any cost, even if it means slight transportation inconveniences.

When I reviewed the plans for I-94, I saw that the freeway would include three-lane service drives, I saw that it would remove permanently the footbridge that connects our neighborhood with Wayne State University and that it would remove the 3rd street bridge, cutting off the Fourth Street neighborhood. The plan pretended to address concerns about removing historic structures by stating that they would be videotaped for archiving. It stated that putting sidewalks along these three-lane service drives would be beneficial to the neighborhood.

We who live in this neighborhood do not want three lane service drives, and if they were built, it would be the last place we would want to use a sidewalk. I-94 should be repaired, but it does not need to look like I-696. People do not walk across I-696. We like it here because we can walk and bike and jog through historic neighborhoods to Wayne State University and to the most important cultural institutions in the state.

We learned long ago in Detroit about the damage freeways can do to communities. Please do not make the same mistake again. The I-94 plan would chip away at one of Detroit's few remaining pockets of historic neighborhoods. It would remove important bridges and create immense and forbidding spans of concrete between our neighborhoods.

Detroit's neighborhoods are on the brink of a great resurgence, but it is still fragile. The plan for I-94 might be good for truckers and commuters trying to get back to the suburbs, but it is one more insult to those of us who love this city and want to see it once again a place where people want to live.

Bill Aro
4705 Avery
Detroit, Michigan 48208

April 2001

Dear Sir,

Rail transit, both within and between cities, is the most sensible, economic, efficient, comfortable ^{way} to travel.

More & more people are driving their cars, hundreds of miles clogging up the highways; Every body needs a car to get home.

Decades ago historians of technology as Lewis Mumford deplored and decried the massive government subsidies to highways and carriers predicting correctly the, auto nor the airplane could provide adequate substitution for the rails

Respectably
Emilia Polak Bromiala
19699 Sunset
Det. Mi. 48234

Fund transit instead of just pavement

Thank you for your editorial on Michigan getting shortchanged on bus funding ("Bus Money: Misplaced federal priorities shortchange Michigan transit systems," Nov. 26). Additional reasons include:

■ We have no local political champions for public transit. Neither Detroit Mayor Dennis Archer, Gov. John Engler nor any of the southeast Michigan county executives have stepped up to the plate.

■ We have no regional transit plan. We allow Lansing to require a SMART-DDOT merger as a precondition to do a regional transportation plan. Engler has found a way to say no to transit by insisting on a bogus condition he knows politically cannot be met.

■ There is no dedicated source of revenue to pay the local share of capital costs and all of the operating costs for new systems. These reasons help explain MDOT's arrogance in proposing a \$100-million, pavement-only access for Detroit's east riverfront. MDOT has ignored transit because official indifference allows it to. MDOT's suburban-style horseshoe-curve design cuts off pedestrians and local streets, obstructs commuter rail, frustrates transit, and degrades GM's new mixed use and residential development.

You have the chance to say no to this absurdity. MDOT's public hearing on the I-375 boondoggle is today at Christ Church, 960 E. Jefferson. Sessions are from 3:30-5 p.m. and 7-8:30 p.m.

This project will shape the future of our riverfront and downtown for generations. Smarter, better, faster and cheaper alternatives are available: \$100 million is enough money to do an appropriate urban scale upgrade of the I-375 and Jefferson intersection, build new access roads for GM, and implement commuter rail from Pontiac to Detroit. Your silence is a vote for the waste of tax dollars and our urban environment.

You can also send comments to Jose Lopez, MDOT, P.O. Box 30050, Lansing MI, 48909, or email: lopezjos@mdot.state.mi.us or fax 517-373-9255.

Karen D. Kendrick-Hands
Cofounder
Transportation Riders United
Grasse Pointe Park

We need to re-institute a train for commuters!!

-MAIL: letters@freepress.com
attachments, please)
ers to the editor can be read
www.freep.com/index/lettersedp.htm

LETTER POLICY: All writers must provide full name, full home address, and day and evening telephone numbers. Letters should be 200 words or less and are subject to editing. Anonymous letters, photocopies, letters to third parties and letters to other publications will not be considered.

Keep some of these cars off the roads!

BY SARA CALLENDER
STAFF WRITER
scallender@ec-home.com

Easing the traffic gridlock on I-75 in Oakland County won't be cheap.

Consultants Thursday laid out a \$701-million plan during an informational meeting at Troy City Hall that proposes widening 46 miles of I-75 from Hazel Park to Holly Township. The plan, presented by Joseph Corradino of The Corradino Group, includes nearly \$460 million for the addition of one lane in each direction, improvements at seven freeway interchanges and construction of a new interchange at Clintonville Road in Independence Township. The plan also targets \$213 million for improvements to 32 roads that feed the freeway.

Corradino, who has been conducting a 15-month, \$400,000 study on I-75 improvements, said the plan would shave off around two minutes of drive time at morning and afternoon rush hours.

"That might seem like a minimal amount of time but it adds up when you consider the amount of traffic that is out there," Corradino said. "There is no way to take out all the congestion."

The population of Oakland County has doubled since its part of I-75 was constructed in the 1960s, Corradino said, and the population is expected to increase by another 30 percent over the next 20 years.

The study includes improvements to I-75 interchanges at I-696, 12 Mile, 14 Mile, Rochester Road, Long Lake/Crooks roads, Sashabaw and Dixie Highway.

Corradino said the proposed improvements have never been used in Michigan

and would help eliminate traffic backups onto the freeway.

"This design will help traffic flow but it is also an added safety feature," Corradino said.

Corradino said the plan does not include improvements to the I-75 and M-59 interchange in Auburn Hills, which is currently being studied by the Michigan Department of Transportation.

Arterial north-south roads that would be improved under the plan include Degenbire, John R, Rochester Road, Livernois, Crooks, Greenfield, Adams, Jaslyn and Sashabaw. Among the east-west roads are 13 Mile, Big Beaver/Quarton, Long Lake, Square Lake, South Boulevard, Dixie Highway and Walton.

Corradino said the final report on I-75 improvements will be ready in August. If the plan is implemented, construction could begin by 2003, he added.

Some people who attended the meeting like Troy resident James Savage, said planer should concentrate on creating a viable public transportation system instead of building a larger expressway.

"All avenues of mass transit should be explored before spending tax payers dollars on road improvement," Savage said. "We need less traffic, not more roads."

The I-75 study was commissioned by the Michigan Department of Transportation, the Southeast Michigan Council of Governments, the Road Commission for Oakland County and the Traffic Improvement Association of Oakland County. MDOT holds final approval over the recommendations.

Roads from page A1

times."

Other traffic reduction alternatives are flexible work hours, compressed work weeks, staggered work hours and telecommuting.

Several business representatives at the meeting said they already offer traffic-reduction options.

Mary Beth Maciak, of Delphi Automotive Systems, said the corporation incorporates flexible work hours and telecommuting.

"I think it's working pretty well," Maciak said. "You always have to consider your business needs. Sometimes you have to be in the office. It's something that the supervisor and the employees work out."

Karen LaDuc, public relations coordinator at Troy Beaumont Hospital, said Beaumont employees work full time from their homes. She said Beaumont supplies the employees with any equipment needed for the job.

"It doesn't seem like a huge amount of care but it helps," she said.

Troy City Manager John Szerlag said there are over 5,800 businesses in Troy and 110,000 employees. Around 400,000 vehicles travel through the city each day, he said.

City and chamber officials are hoping to hold another traffic congestion meeting in September.

* And isn't this a crime and a shame!

SA DETROIT FREE PRESS

Detroit Free Press

An Independent Newspaper

600 W. Fort St.,
Detroit, Michigan 48226
313-222-6400

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IN OUR OPINION

The Right Track

MDOT should invest in Detroit-Lansing rail study

A plan to introduce rail service from Detroit to Lansing would give commuters an alternative to clogged freeways and the state a way around spending millions more to maintain and widen I-96, I-94 and U.S. 23.

It's time for the Michigan Department of Transportation to get on board. MDOT should cheerfully cough up the \$500,000 — chump change in the world of highway budgets — to enable a \$2.5-million regional rail study to move ahead. The \$500,000 is the state's 20-percent share of the study — an amount that would barely pay for 50 feet of urban freeway.

The feds will pay for the rest of the study — but not without a 20-percent local match.

The two-year study will, among other things, examine environmental problems, seek public comment and do some early engineering work.

If the rail project gets a green light, the federal government will also pay for 80 percent of the \$80 million needed to develop the railway, including improving nearly 100 miles of track, building train stations and providing all crossings with guard rails.

Service would start in 2005 with five daily round trips, including stops in East Lansing, Howell, Ann Arbor and Dearborn. A one-way ticket from Detroit to Lansing — about a one hour and 45 minute trip — would cost about \$12.

Adjoining communities would pay operating subsidies of \$6 million to \$8 million a year. Trains would carry 411,000 commuters and other riders the first year, but eventually nearly double that, estimates Lansing's Capital Area Transit Authority, which is managing the project.

Metro Detroit is the nation's largest urban area without rail service.

With traffic in the rail corridor estimated to increase 30 percent over the next 25 years, now's a good time to start giving drivers another way to go.

Despite a gush of transportation dollars from more federal highway aid and a gas-tax increase in 1997, the state continues to be tightfisted and shortsighted about funding mass transit. Its reluctance to become a partner in regional rail service in southeast Michigan by helping pay for a study to move the project forward is just more myopia.

It's time for the state to get on track.

Hicks

469 MANOR
GROSSE PTE. FARMS, MICH. 48236

March 27, 2001

Dear Mr. Lopez;

attached please find article in Sunday Detroit News
- Free Press (3-25-01). The problem to be addressed is
Public Transportation. People cannot get to a job
without it. Please Mr. Lopez align your focus
on this important matter!!

Sincerely,

Ronald W. Hicks

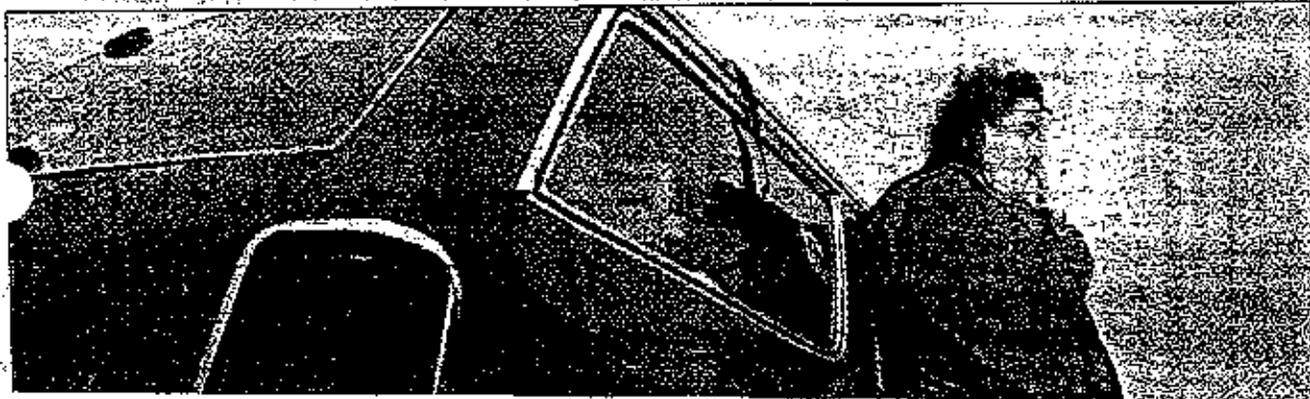


Left Behind

The forgotten victims of poverty

A DETROIT NEWS CONTINUING SERIES

Off welfare, still k



Althou
lose of
boom

By Ron French
and Gregg Kru
The Detroit News
The booming
past decade pr
of poor Ameri

Public transportation. People cannot get to a job without it. Please Mr Lopez align your focus on this important matter!!

Sincerely,

Ronald W. Hicks



Left Behind

The forgotten victims of poverty

A DETROIT NEWS CONTINUING SERIES

Off welfare, still broke



Lori Denton, 36, and her three children wound up at a homeless center when she was fired because unreliable transportation caused her to be late for work. Solving the transportation problem is integral to the success of welfare-to-work programs. *Deanna Turk / The Detroit News*

No car, no bus means no job

By GREGG KRUPA • The Detroit News

WESTLAND

Moving from welfare to work seemed like a breeze for Lori Denton. She liked the state's Work First program, and it helped her find a job making boxes for Chrysler parts at \$6.50 an hour.

Although the \$5,500 a year kept her below poverty level, the single mother of three said she liked the new challenges in her life and the reserved feelings of pride and self-worth.

But then her beat-up 1983 Mercury station wagon broke down. She started getting demerits at work for being late

or absent. She'd get the car fixed, but then it would break down again.

With no buses running from her Westland home to her job in Ann Arbor, she sometimes got rides to work from friends. When the demerits totaled 20, her employer fired her. She says

she considered it tough, but fair.

"They have a business to run," said Denton, 36, sitting in the cafeteria of the Westland homeless shelter, where she and her children now live. "You have to show up on time for work. I really feel like I did everything right to keep that job — except for that lousy car."

The biggest problem for the working poor, now called upon to work to obtain government assistance, often is just getting from home to work. Lack of transportation is a major force that continually pulls them back into poverty.

As politicians, bureaucrats, advocates for the poor and academics evaluate welfare

reforms in Michigan and across the country, solving the transportation problem is increasingly viewed as critical to getting the poor from welfare to work and eventually to self-sufficiency.

Many say it will loom as a significant problem when Congress considers renewing federal welfare reforms in 2002. Advocates already are organizing around the issue, hoping to persuade Congress to not reduce funding to the states — despite the significant declines in welfare rolls — so more of the money can be used to solve the persistent transportation problems of those who must still find work.

Please see WDES, Page 12A

Although employed, poor lose out on economic boom and still struggle

By Ron French and Gregg Krupa
The Detroit News

The booming economy of the past decade provided millions of poor Americans with jobs, but little else.

Why so many were left behind is a question that today haunts agencies aiding the poor. Behind the frustration is a fear only now being addressed: The millions who stumbled through such halcyon days will be even more vulnerable when the good times end.

And the good times may be ending. Michigan is in a mild recession, and the nation's historic 10-year streak of economic growth is faltering. Hardest hit are the people who can least afford it, those who lived on the economic edge while do-nothings grew fat and the auto industry boomed. The forces that kept millions poor through the good times could become even more pronounced during a recession — forces such as transportation, education, housing and a scarcity of affordable credit.

Welfare reform and low unemployment of the 1990s transformed millions of the poor into the working poor, holding jobs but still scrambling to survive under the federal poverty guidelines. Two-thirds of poor families now have at least one working adult, according to the Washington, D.C.-based Center on Budget and Policy Pri-

Working poor increase

Number and percentage of all working families that are poor.

Year	Number of families	Percentage
1975-80	44,700,000	4%
1980-85	47,000,000	7%
1985-90	49,000,000	8%
1990-95	51,000,000	9%
1995-00	53,000,000	9%
2000-05	55,000,000	10%

Source: Center on Budget and Policy Priorities
The Detroit News

orities. Among all U.S. working families, the percentage who are poor doubled from 1980 to 1999, from 4 percent to 8 percent.

In Michigan, more than 150,000 residents have been moved off welfare and into jobs in the past decade. Yet for the participants in Michigan Works!, the state's welfare-to-work program, the average job in 1999 paid \$6.65 an hour for 35 hours of work. That's \$232.75 per year — below the federal poverty guidelines for a family of two.

"The perception is that things are better," said Sharon Parks, a Michigan advocate for the poor. "But look at the earnings level. That's where the rhetoric ends and the reality kicks in."

MORE INSIDE



Rubin Jackson / The Detroit News

Tammy Boyette, 29, waits for a bus, the only transportation she has to the Southfield Career Center. A 15-minute drive by car, the trip by bus is 2 1/2 hours for Boyette.

Tammy, Jennifer: Two single moms struggle to get to work. Page 10A
Solutions: Transportation woes threaten welfare overhaul. Page 10A
Hurdles: Working doesn't mean better quality of life. Page 11A

ABOUT THIS SERIES

Throughout the year, The Detroit News will explore the forces that hold people in poverty during unprecedented good economic times, and how they can even more as Michigan tries to work its way out of a mild recession.

TODAY'S TOPIC: TRANSPORTATION

Michigan, the state where the automobile is king, historically has lagged in providing reliable public transportation. For the poor trying to move from welfare to work, the lack of an efficient mass transit system is one of their biggest obstacles to escaping poverty.

4/16/01

We do not need more concrete. Good public transportation is what we need. There are too many SUV's, the trucks are way to big and the speed limit is way to high.

Commuter Rail Lines would be better and less expensive to maintain - we need some sacrificing from a lot of people or we will destroy this city and the people in it.

Sincerely
Rosemary Tonscany

April 8, 2001

Mr. Jose A. Lopez, Public Hearings Officer
Michigan Department of Transportation
Box 30050
Lansing, MI 48909

Dear Mr. Lopez:

It has come to my attention that part of I-94 is being considered for a total rebuilding that might include adding lanes to the freeway and to the service drives, at a cost of approximately 1.3 billion dollars. I am opposed to spending such a large amount of money on a project that will add congestion, pollution and loss of businesses if this project is implemented. If any rehabilitation is necessary for that stretch of I-94, it should restrict itself to the lanes that already exist, and not to the addition of new lanes. This would free-up money that could and should be used to implement a fixed-rail regional commuter system to connect downtown Detroit with its suburbs. The rail commuter system will help to alleviate traffic congestion, pollution, and will help to stimulate economic growth in downtown and central Detroit. This is a goal that we all should be aiming for.

Respectfully,

Stephen Cybulski

Stephen Cybulski
6261 Grandville
Detroit, MI 48228

3-18-01

The proposed "I-94 rehab project" is unnecessary at this point in time when investment in public transit projects is almost nil. Roads are expensive to maintain and the almost total auto dependence within our region is unhealthy and contributes to our state's high ranking for obesity. I know a lot of people and there's not one who believes that we don't need improved public transit lines. Many people of all ages claim they would use well-designed, efficient public transit. Money spent on I-94 would be better spent on construction of at least four subway lines. That would be ^{economic} ~~healthy~~ progress.

Paul Martonick

April 6m 2001

Mr. Jose Lopez
Public Hearings Officer
MDOT, Lansing Mich.

SUBJECT: I-94 Traffic Congestion -Detroit Area

Dear Mr. Jose

I use the subject expressway dailey. I notice cars racing by me when we are about 5 miles before we enter the Detroit city limits. This is true whether traffic is east or west bound. Suddently everything comes to a streaching stand still!!

We have a standing joke in our car pool passengers regarding the speed limit posted during the tie up such as "fellows we can only go 45 MPH here as posted"

My suggestion is to reduce the speed limit to 45 MPH in both directions (or less if necessary) 5 miles before you enter the Detroit City limits during the summer construction season whether they are working that or not in the interest of simplicity and have the public educated with enough notice in advance.

It makes no sense to spend billions to widen this road in the future removing homes etc. when controlling the speed limit to accomadate the situation as it becomes necessary.

I firmly believe this practice could prove effective and be used as a pattern for other expressway work through out Michigan.

With Respect

Philip A. Lopiccola
Philip A. Lopiccola
1844 Brys Drive
Grosse Pointe Woods, Mi
48236

CC: Gov. John Engler
P.O Box 30013
Lansing, Mi 48909

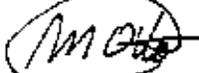
Mark Otto
8351 San Marco Blvd
Sterling Heights, MI 48313

Jose A. Lopez,
Public Hearings Officer
PO Box 30050
Lansing, MI 48909
517-373-9534

Dear Sir(s),

Please forward any information on the next round of public hearings regarding the refurbishment project of I-94. I believe all information should be available and presented in its entirety to the citizens of metropolitan Detroit in a timely manner. More public hearings are essential to all parties involved. All information pertaining to this project should be presented accurately and quickly. Let's do something good for the city of Detroit and not allow another black mark on the already tainted MDOT record.

Thank You,


Mark Otto

April 17, 2001

Mr. Jose A. Lopez
Public Hearing Officer
Bureau of Transportation
P.O. Box 30050
Lansing, Mich. 48909

Dear Mr. Lopez,

I am writing regarding the widening of I-94, that is scheduled to go through our city of Harper Woods.

We have lived in Harper Woods for the last 30 years. Our family lives in the first block off the service drive.

The noise from the X-way is horrible now, I can't even imagine what it will be like when additional lanes are added. It sounds like we are in a wind tunnel.

I invite you or any of your associates to come to our home, and listen to what we have to listen to.

1st objection: Health - the incidence of asthma are extremely high in this area. My daughter has had asthma and bronchitis ever since we have lived here. Now her son has had many bouts of bronchitis, asthma - he is four yrs. old - they live 2 blocks from us - also in

the first block off the service drive. I have had recurring bouts of bronchitis, and several of our neighbors have asthma.

2. Noise - not just the traffic - which in itself is bad enough, but the sirens from emergency vehicles, plus the helicopters flying over the X-way monitoring traffic. Add to all of this the jet's from City Airport.

3. Whether there is an accident on the X-way our residential streets are used, because the service drive is so jammed with cars they use our streets to avoid this traffic jam. Not only is the traffic on our streets terrible at this time, but the drivers think they are still on the X-way, and are speeding through here.

4. We also have an elementary school (Poupart School) that practically sits on the service drive now, the playground is no more than 10 or 15 feet from the service drive. This is extremely unsafe for the children attending this school.

I really don't know who the Transportation Dept. feels this project will benefit, certainly not the people who live in this area, and pay taxes here. We are here 365 days a year, 24 hours a day.

The people who travel through this area, may spend 1/2 hr traveling through here. This is where we live and are subjected to all that goes with it.

There are many other ways to get downtown: Detroit, Mack, Harper, Lake Shore Drive to Jefferson. These are all streets that get used when the X-way is closed for repairs. Let's share the noise, and everything that goes with it.

As homeowners we have no choice - this is where our homes are - and have been. We like our community. But, drivers do have a choice, as I mentioned there are many other avenues to travel.

(My daughter is a nurse downtown at the Detroit Medical Center, and when the X-way is closed for repairs, she said it adds only an additional 10-15 min to her drive.)

4

I tried to get some of our neighbors to write to you, but they feel it is just a waste of their time - they all feel it will just fall on deaf ears. They all feel it is a done deal. I really hope you will read this letter and take into consideration some of what I have written. I just feel I had to respond to this matter.

Again Mr. Lopez, I invite you, or anybody from the Transportation Dept, to come to my home, sit in our kitchen with the door wall open, or the windows open, and just listen to what we have to hear.

Mrs. Darlene Moore
20910 Lancaster
Harper Woods, Michigan 48225
Telephone: 313-882-5498

Ralph Slovenko

PUBLIC ENEMY NO. 1 THE AUTOMOBILE

Community, we all know, is vital to mental health. But what makes a community? What drives it asunder? As I see it, nothing is more devastating to community vitality than the automobile way of life. It is past time to charge: the automobile is Public Enemy No. 1.

The automobile is driving people mad; yet is rarely, if ever, discussed at meetings or in publications of mental health professionals. There is much propaganda about basing mental health centers and corrections programs in the "community," but it never seems to be asked, "Where is the community?" The fact of the matter is that there is no community—it disappeared with the coming of the automobile.

To mollify increasing public disenchantment, and to make the automobile worker feel that he is doing useful work, advertisements convey the message that the automobile is consonant with an attractive, invigorating environment and that ownership is a requisite of the full, rich life. In fact, though, the automobile brings ugliness, pollution, economic waste, agony, injury and death. Integrity in advertising would call for portraying the automobile not in a sylvan setting, as is now done, but rather in a traffic jam or collision.

Unlike our forefathers, who stepped out of their doors into a rich communal setting, we encounter arteries of traffic. The streets are now monopolized by the automobile, which has displaced children, pedestrians, bicyclists, streetcars—in brief, everything but other automobiles, parked or in motion. In 1908 in the *Yale Law Journal*, H. B. Brown, retired United States Supreme Court Justice, urged the courts not to disregard the rights of others in favor of the motorist. His plea went unheeded.

The number of automobiles has been increasing five times as rapidly as the human population and is the principal cause of

environmental degradation. The automobile not only causes noise and air pollution, but also makes enormous territorial demands. An automobile requires 1400 square feet of space for turning and parking, equivalent to the living space of a family unit. The shopping or apartment facility is dwarfed by the space allocated for parking. College campuses have been turned into huge parking lots. Concrete-covered terrain and "service stations" — not for humans but for cars — at nearly every corner are rapidly replacing all rustic scenery.

The rotting downtown, the sterile suburbia, the ticky-lacky shopping center, the desolate motel are all vulgar monuments to the auto culture. Our national flower, observed Lewis Mumford, is the concrete cloverleaf. In *The Highway and the City*, Mumford writes: "In using the car to flee from the metropolis the motorist finds that he has merely transferred congestion to the highway and thereby doubled it. When he reaches his destination, in a distant suburb, he finds that the countryside he sought has disappeared; beyond him, thanks to the motorway, lies only another suburb, just as dull as his own. . . . In short, the American has sacrificed his life as a whole to the motorcar."

As the car gains dominance, the outside becomes less a place for living than for driving through, and community activities fade away. Urban space becomes degraded. The once-charming Zócalo, the public square in Mexico City, where people used to gather and stroll, is now a maelstrom of traffic, noise and pollution. A once-beautiful Los Angeles basin has been turned into a disaster area. Saudi Arabia, with money gushing in for its oil, has been turned into a dump for cars. Cape Town is no longer a gem of a city. Indeed, one is hard put to find a place that has retained its charm in the face of the mechanical invader.

The disintegration of our cities began with the advent of the cheap, mass-produced car (combined with cheap fuel) and became catastrophic after World War II when the majority of people could buy one. Not included in the sticker price, though, was the cost to society at large.

"Every man a king," promised Louisiana Governor Huey Long, "a car in every garage," but the car (or two) now presiding

in every garage has reduced its owner to a chauffeur rather than elevating him to an imperial level. Mother today doesn't cook much of a meal, but it's not her fault — she's driving a car pool, chauffeuring the kids around, or tied up in traffic coming home from work. And one who finally gets through the traffic to get to his psychoanalyst is so exasperated by the hassle that he spends his 50-minute hour unwinding.

Every man a lover, the automobile industry promises. At one time the car did provide access to a highway, but the plethora of vehicles and the vast network of highways to implement them have now destroyed virtually every romantic setting. A multitude of ads continues to depict the car as synonymous with sexuality, but showing one off today, including Mach 1, produces only a yawn. A car produces only an illusion of power and sexual magnetism. "Putting a tiger in your tank" does not do much good if there's a jackass at the wheel, and that's what the automobile really makes out of people.

Man-turned-into-jackass spends hours each day at the wheel; and hours parking it; reading or listening to advertisements about it; insuring it; fueling, cleaning, or repairing it; recovering from injuries or backache from driving it; and attending funerals of friends or family who have died in collisions (60,000 a year in the United States). We seem to worry more about the car than about baby. Our every thought seems to revolve around the car. Illustrative is the recent experience of a kidnapping victim. Upon her release she went into a drugstore to telephone home. Seeing her in tears, the druggist asked, "What's the matter, lady, you got car trouble?"

With no viable alternatives, buying and insuring and driving a car is as voluntary an act as penitence. Though forced to drive, the motorist — not the automobile industry — is held responsible in the case of collision. A kind invitation, "Have one for the road," is fraught with hazard — as we can get about only by car, drinking is perilous, day or night. The seat-belt and air-bag, though possibly reducing injury, complete the ludicrous picture of man imprisoned in a capsule. Children, the elderly, the poor, and others who do not drive due to poor vision or other

handicap are all immobilized prisoners of another kind. Generally, public transportation is unavailable and taxi fare is too expensive for regular use. (Taxis eliminate as customers those who cannot afford to pay \$3 to \$5 for a ten-minute ride.) The old song, "I don't get around much any more," is appropriate today for many.

The constitutional rights of freedom of movement and association are being curtailed by the very technological development which was heralded as implementing these rights. The automobile creates a style of life that extends distances — it disperses shops and dwellings — which in turn require an automobile to get about. As these machines multiply, however, they immobilize even themselves. Traffic on the average moves more slowly today than in 1905. The overall result is that transit in the U.S. ranks next to that in Pakistan.

Not only community life but family life is frustrated by the automobile. An old maxim — what separates me from my fellow man also separates me from my family — expresses that sentiment. The outside has been lost as a place where man can spontaneously meet, talk, sit or walk around with others. He is cooped up either at home or in a capsule. He takes out his agony and frustration on his spouse or children. The relationship of the automobile way of life to divorce, child-abuse, and homicide should not be underestimated. It may be no coincidence that Detroit, the motor city, is also the murder capital of the world.

The automobile way of life makes Solzhenitsyn react as fervently as he does to labor camps. In a lengthy letter to Soviet leaders in the fall of 1973, he warned against the horrors of the automobile and urged the Kremlin not to encourage the emulation of that style of life. He wrote: "And all of you are old enough to remember the old cities, before the advent of the automobile — cities intended for people, horses and dogs. . . . In spring the sweet scent of gardens wafted over the fences into the streets." He pleaded, "Do away with the automobile."

People in the U.S. arriving at work no longer say "Good morning." "What's good about it?" I'm asked by a student just coming off the so-called freeway. The "freeway" ("expressway")

is verily a euphemism for a Gulag Archipelago. To be sure, recent emigrés from the U.S.S.R. say, the torture and frustration on the "freeway" make the Soviet Gulag Archipelago seem like a rest home in comparison.

Amanda Bush
1660 Faircourt Street
Grosse Pointe Woods MI 48236

April 26, 2001

Jose A. Lopez

Bureau of Transportation Planning
MDOT
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez,

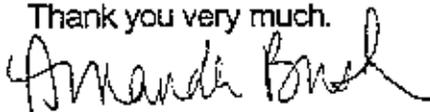
Thank you for considering this letter.

I am against expansion of I-94 on the east side (I-75 eastward). I am strongly in favor of commuter rail lines.

Please consider "the quality of life" for everyone. I took the SMART buses to work from Mt. Clemens, Royal Oak, Grosse Pointe, and Harper Woods for nearly 15 years everyday. It benefited me and my community.

Mass transit can be convenient, quicker, safer, and better for the environment. The tri-county area needs to join the 21st century and set up a state of the art system for this community, not make the highways wider, and wider, when will that end and how can that possibly improve our community?

Thank you very much.



Amanda Bush

313-881-6807

Jose A. Lopez
Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI, 48909

2014011010
10:00 AM
10:00 AM

Re: Comment on I-94 widening in Detroit.

Dear Mr. Lopez -

I live in Grosse Pointe Park. I work in Detroit. Driving the stretch of I-94 under consideration for a 1.3 billion dollar investment, I know this roadway needs repair. But I do not think this is the highest and best use of public funds. Let me elaborate. I am not from Grosse Pointe, in fact I hate it there. Grosse Pointe is not a bad place; it's just that everyone I want to see lives in Ann Arbor. My friends say I could commute but consider what it would cost me:

Case 1: my car. Ten percent of my waking hours devoted exclusively to gripping the steering wheel, rocketing down the highway in a tin can. Road rage, seeing fatal accidents weekly, praying for traveling mercies, worrying about hydroplaning in the rain, losing traction in the snow. Breathing exhaust fumes while stuck in traffic. Feeling guilty for spewing pollutants out of my tailpipe. I can afford the insurance, gas, tires, oil, and batteries, but not the stress.

Case 2: a train. Lean back and take in the scenery, eat a ham sandwich, do tai chi, nap, skim the headlines, talk on my cell phone, work on my laptop, get to know my neighbor, polish my nails, play chess, prepare for work, unwind from work, drink tea, watch TV... in short, just about anything I would do in my living room except sit around in underwear. And for less money than dinner and a movie.

But wait: **I CAN'T TAKE THE TRAIN!** As much as I wish differently, there **IS** no commuter train. MDOT doesn't invest in trains because the lion's share of expenditures goes to roads. Then I read in the Grosse Pointe Times that there could be three trains, to Mt. Clemens, Ann Arbor, and Lansing, for one-tenth the cost of this one more highway project. If I had a train to take, believe me Mr. Lopez, I would be in Ann Arbor with my family and friends.

So I am writing to tell you that I am one thousand, no, one point three billion percent opposed to that amount of public money going towards highways - particularly highway lane addition. Other communities' experience shows that this is a temporary solution to traffic problems at best. I support any decisions that reduce the amount of funds going to roads and direct money towards alternative modes of transit. A compromise: make it 18 lanes instead of 20 and build me a train that serves fried eggplant!

Respectfully yours,



Shawn Marie Severance
1143 Beaconsfield #4
Grosse Pointe Park, MI, 48230
shawn_severance@yahoo.com

2216 Mellowood Drive
Sterling Heights, MI 48310
April 19, 2001

Mr. Jose A. Lopez
Bureau of Transportation Planning
MDOT
PO Box 30050
Lansing, MI 48909

Dear Sir:

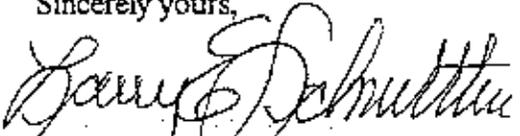
Recently I was reading an article regarding the rehabilitation of I-94. While I agree that the road does need to be redone, I disagree that it should be widened. I realize that you can site all kinds of future increased traffic flows to justify the massive expenditures but the fact remains that it will never solve the congestion problems facing Michigan.

It was my understanding that the tremendous amounts of tax dollars being spent in the past few years were to rebuild Michigan roads which I might say are still the poorest in the nation. And yet, it appears that you folks are still in the new road-building mode. Another recent surprise that I read about is the expansion of M-53 from 27 to 34 mile road. Again, this doesn't solve the congestion problem; it will only move it to another area.

It's ironic that you are planning to spend millions to expand portions of I-94 and M-53 while further north on M-53, i.e. Huron County, the road is falling apart. When will you folks learn that you can never build enough roads to solve the problem of congestion while spending for mass transit is about the lowest in the nation?

It is easy to understand why our roads continue to be so poor in Michigan while you continue to pursue building new roads which you won't be able to care for in future years.

Sincerely yours,



Larry E. Schnettler

GREATER DOWNTOWN PARTNERSHIP

April 9, 2001

Katherine F. Beebe
President & CEO

Mr. Jose A. Lopez
Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P. O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez,

I am writing in response to your request for comments regarding the "Build Alternative" outlined in the recently released I-94 Rehabilitation Environmental Impact Statement (EIS).

The Greater Downtown Partnership supports the work of the New Center Council to create the area bounded by I-94, Woodward Avenue, the CN/Conrail railroad and the Lodge freeway as a walkable, pedestrian-friendly mixed-use neighborhood. This summer construction will begin on 100 loft style apartments just three blocks north of I-94. Also, Wayne State University is leading an effort to develop a 500,000 square foot urban technology park in this same area. Street vitality and pedestrian are a priority for this project area.

The Greater Downtown Partnership has worked closely with the New Center Council and has many of the same concerns that were voiced to you in the letter sent by Kurt Weigle on March 26, 2001.

Chief among our concerns are:

1. The I-94 Rehabilitation, as portrayed in the EIS, could create a barrier between the New Center and University Cultural Center, hindering efforts to knit together these two districts.
2. The sidewalks, as shown in the EIS, would be virtually unusable because of their proximity to the service drives where traffic will be passing by at up to 60 mph. Sidewalks may become useable if a raised planter filled with trees and landscaping separates the pedestrian from traffic.
3. We also are concerned that the concept of terracing portrayed in the rendering will become filled with weeds and litter. The precarious position

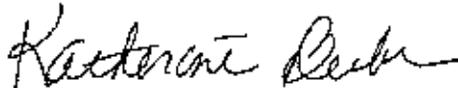
GREATER DOWNTOWN PARTNERSHIP

of the terraces make them extremely difficult to maintain. The NCC's suggestion to install non-terraced red brick retaining walls would decrease right-of-way and provide an attractive visual image.

4. The location of the pedestrian walkways should relate to street patterns or pedestrian pathways. The placement of walkways should not be dictated by the placement of vehicular U-turn structures, but by the natural pedestrian crossing points.

The Greater Downtown Partnership appreciates MDOT's desire to rehabilitate I-94, and ask that you address these concerns as you complete project planning.

Yours truly,



Katherine F. Beebe

cc: Kurt Weigle, New Center Council
Sue Mosey, UCCA

Frank C. Corley, P. E.
23600 Marshall
Dearborn, MI 48124-1431

April 2, 2001

Mr. Jose Lopez
Public Hearings Officer
MDOT
P. O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez:

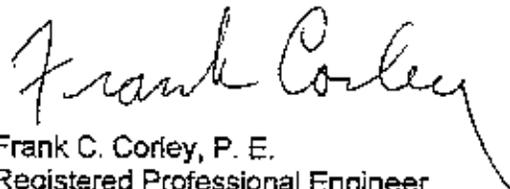
Subject: Widening of I-94

Please allow me to comment on the proposed expansion of I-94. I-94 already is one of the roads that has divided neighborhoods and made life less pleasant in Detroit and suburbs. It is a source of noise and air pollution plus death and destruction from multiple accidents.

Future development should be by rail. It is cleaner, quieter, safer and costs less than adding more highway lanes. We already have lightly used natural rail corridors: Norfolk Southern, ex-Wabash next to I-94. It could readily serve from airport to downtown. Norfolk Southern, ex-CR, PC, MC next to Michigan Avenue could readily serve from Ann Arbor and west to downtown. We also have the CSX corridor that could serve area along I-96 and on to Lansing and west. One CN (GTW) corridor could serve the Woodward route north to Durand. CN(GTW) has another lightly used corridor out to Mt. Clemens and Port Huron. There is no need to expand I-94 or any other expressway. We have under-utilized existing rail corridors that can be used.

I recently have visited Seattle, Portland, Sacramento and San Francisco. They all have light and heavy rail facilities that are filled with tourists and locals. They are fast, clean, efficient and non-polluting. When new rail operations are initiated, both residential and commercial development and re-development skyrockets near the transit stops. We should spend future highway money on rail transit to revive SE Michigan.

Best regards,



Frank C. Corley, P. E.
Registered Professional Engineer
Michigan # 17053

May 7, 2001

Dear Mr. Lopez,

I wish to take this time to thank you for the DEIS and related documents concerning the I-94 Rehabilitation Project.

I took the time to read these documents and wept over what the full scope of this project will do to the area nearby the freeway.

I was not impressed by your views on mass transit. Nowhere in this study did I get the impression that M-DOT has a transit vision that would include improvements in mass transit.

In the third paragraph of 4.5.2.1 there wasn't even a mention of the Coolidge Terminal or Schaefer near Green River. Was it closed down or no longer being considered as a D-DOT terminal?

I am surprised to see 1.5.2 come right out and explain how negatively impacted the poor and minority will be if this project goes through as planned. Why should this be allowed to occur? Should this segment of the population be made to suffer once again so that a true lane be put in the center to speed cargo from Canada to Mexico? See 2.2 especially paragraph 5. Should the poor and minorities be shoved out of this corridor so that single passenger cars have a faster, easier smoother ride from North & East suburb Downriver and Western suburbs and nice per

Detroit cannot afford another dip in its tax base no matter how small. It

expansion would cut into Detroit's tax base without adding one dime to City of Detroit businesses. None of your maps describe a plan to encourage drivers to leave the freeway for Detroit destinations.

Detroit's property tax revenues will also drop because of this expansion. Revenue comes from these properties no matter how cheap you might want to refer to their values!

Since Detroit will not benefit in any positive way does this mean that Detroit and Detroiters will not be asked pay for it?

When I was at the meeting at the African American Museum talking to M-DOT officials in early March I was told that this project will be funded by Michigan's gas tax. What are we talking about? 1.3 billion dollars before cost overrun? Am I to believe that this is really possible?

The asthma rate within the City of Detroit is higher than within any other city in this region. Because mass transit will not be incorporated in this project to the level needed what will happen will be an increase in one passenger cars and true travelling through Detroit on the way to anywhere else. Was poverty and being non-white not hard enough for the people along the corridor? Must you add an increase in health risks and shorter life span also be a part of this expansion also

I was also disturbed by the unretained devastation along M-10 as outlined in the map on 5-75. Some of the places

concern to me include Stone Pool at H-10 at Forest, a relatively new housing complex across the street from the pool, the strip mall on the other side of the freeway, Warren, Freedom Place, Day School for the Deaf, Poe and Edmonson Schools, Henry Ford Hospital at its eastern end, etc. . .

I have learned that you will have to move from Research Park but for many people will be uprooted from Freedom Place? I have not heard of any dialogue on this.

I learned that only one house would be removed from Fourth Street but the service drive emptied into that street. Would you want to live there with your children playing in a street that the service drive emptied into?

I-94 needs repaving badly. It has been needed for years. Paving will hold on I-94 is no longer practical. Many of the bridges along this freeway do need replacing. I have no problem with total repaving or bringing bridges up to current code by replacing at practical heights.

Please, lets be reasonable. Detroit does not need this freeway to be expanded to widths wider than a football field is long.

If this project is built as planned everyone within a mile of I-94 will need to wear an oxygen mask, drink bottled water and eat nothing grown from the paved area.

Sincerely,
Harold Yaker

Joshua Pike

13410 Kenwood

Oak Park, MI 48237

248-541-4644

genericurl@earthlink.net

May 7, 2001

Jose A. Lopez, Public Hearings Officer

Bureau of Transportation Planning

MICHIGAN DEPARTMENT OF TRANSPORTATION

PO Box 30050

Lansing, MI 48909

517/373-9534 (voice)

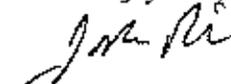
517/373-9255 (fax)

Re: I-94 Project, Detroit Michigan

Jose Lopez:

I am writing to tell you I am opposed to the I-94 widening project. I feel that better mass transit is the solution to congestion, not freeway widening. We don't need more freeway in Detroit. We need alternative means of transportation besides the personal automobile. And there are experts who say that freeway widenings only increase congestion. I support a commuter rail system and improved bus service.

Sincerely yours,


Joshua Pike

Jose A. Lopez

May 5, 2001

Public Hearings Officer

Michigan Department of Transportation

P.O. Box 30050

Lansing, Michigan 48909

Dear Mr. Lopez:

I would like to add my voice to the outpouring of opposition that I hope you will receive regarding MDOT's ill-conceived proposal to further burden Detroit with a massive expansion of I-94. Surely the state government can find better uses for \$ 1.3 billion than making a few miles of interstate highway even wider.

The many racially discriminatory aspects of public policy in Michigan under Governor Engler are well illustrated by this latest proposal: no predominantly white community would willingly accept - or be targeted for - such a massive public works project in its midst, when it is specifically designed not to serve the community itself, but rather to bypass that community. The poorly managed growth of Detroit's outer ring suburban communities is contributing to spoiled resources like Lake St. Clair, partly because of inadequate infrastructure ten to twenty miles north of I-94. Meanwhile, the exploitation of Detroit's inner city for lucrative and unnecessary mega-projects like this, in the nearly total absence of quality public services, such as mass transit, perpetuates the devastation and abandonment of metropolitan core urban communities. This proposal is part of a vicious circle that should be stopped immediately.

Atlanta's experience with widening I-75, followed by even worse traffic congestion throughout their metro area, shows that more and bigger highways can actually cause worse traffic problems. Similar adverse developments can be expected in the Detroit metropolitan area, if this project goes through. While it may be a lucrative deal for the road construction industry, it is an urban planning atrocity that should be rejected by any well-informed official acting in good faith. I ask that the proposed expansion

of I-94 in Detroit be rejected, and the resources used for sustainable development to improve the quality of life in Detroit and its surroundings.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Stephens', with a long horizontal flourish extending to the right.

Tom Stephens

28685 Malvina Ct.

Warren, Michigan 48093

HRK

Harry R. Kurrie

May 11, 2001

63 MEADOW LANE
GROSSE POINTE FARMS, MI 48236

Mr. Jose Lopez - MDOT Hearing Officer
Gov. John Engler
Sen. Carl Levin
Sen. Debra Stabanow
Rep. Carolyn C. Kilpatrick
Rep. Andrew Richner
Mr. Gregory Rosine, Director - MDOT

Hand copy of email sent
May 11, 2001

Proposed I-94 Rehab Project - \$1.24 billion - 7,688% Greater than Base line

I wish to express strong objections to the I-94 improvements proposal outlined in the Rehabilitation Project Environmental Impact Statement (DEIS), for the following reasons.

- Exorbitant Cost - \$1.24 billion (mostly Federal monies), 7,688% higher than the base line no-build alternative (DEIS pg. 9)
- Dramatic neighbor disruption for negligible benefit
- Cost benefit - Huge costs for no benefit
- Project area is too small

For this kind of money, we should be looking strategically at the entire system before dumping it into 6.7 miles of roadway. I think \$1.24 billion focused wisely can generate substantial economic growth for the community with positive cost benefit. Possibly an eight lane bridge from Canada plus redesigned distribution network can shift "freeway to freeway" traffic to an efficient pattern and then use I-94 for commuter traffic.

Exorbitant Cost - \$1.24 billion, 7,688% higher than the base line no-build alternative (DEIS pg. 9)

Nothing makes sense with this type of cost structure - 7,688% higher than the base line - \$1.24 billion cost to rehab 35,376 feet of freeway. That translates into \$35,052 per foot!!

Dramatic neighbor disruption for negligible benefit

The 6.7 miles of neighboring areas will have to endure several years of disruption and excruciating upheaval, for more asphalt, and negligible benefit. Any and all development will stop until the project is completed, instead of letting development evolve. The neighborhoods will fall further behind because of the 3 to 5, 10 to 20 years involved proceeding and during the project. This lost time will never be made up.

Cost benefit - Huge costs for no benefit

The benefits enumerated by the DEIS follow, and are negligible compared to the huge costs, as follows:

- Facilitate revitalization of communities and would influence positive land use options (DEIS pg 1-9) - Absolutely NOTHING specified!
- Slightly improve roadway aesthetics as deteriorating bridges are improved (DEIS pg 1-10)
- Beneficial impacts to aesthetic and visual resources ... such as landscaping. (DEIS pg 1-10)
- Have continuous service drives with sidewalks (DEIS pg 1-7)

I find those "benefits" to be negligible as compared to gargantuan costs of \$1,240 million, 7,688% higher than the base line no-build alternative (DEIS pg. 9). Landscaping does not have to be this expensive.

Project area is too small (I96-Connor)

Traffic through the project area is totally dependent on the I-96, I-75, M-10 surface streets and I-94 (beyond the project area). My experience is there are generally significant impediments beyond the project area that inherently reduce traffic through the project area. For example, the M-10 rehab took a lot of traffic out of the project area. When that was finished, the I-75 rehab took traffic out of the project area.

My point is constriction external to the project area inherently reduces flow through it. So why spend \$1.24 billion (mostly Federal monies), 7,688% higher than the base line no-build base line to construct capacity that 60% to 70% of the time (over the next 30 years) will not be used because of constraints outside the project area. Also, the DEIS anticipates "future transit options" (DEIS pg 1-4). Note however, the future transit options are limited to 6.7 miles, which seems very wasteful as there is NO PLAN TO USE IT or tie it into a broader transit network!

In summary

I strongly urge a strategic look at the road system. I think \$1.24 billion can generate substantial cost benefit and economic growth if spent bore wisely. Possibly an eight lane bridge from Canada plus redesigned distribution network can shift freeway to freeway traffic to an efficient pattern and use I-94 for commuter traffic.

Also, recognize housing construction has renewed within the Detroit and provides homes for all income levels for the employers now locating in the city (GM, Compuware, etc.). This has the potential to impact commuter traffic patters and shift some traffic from I-94. The DEIS was based on 1990 census data, which has changed quite a bit from the current situation.

A handwritten signature in black ink, appearing to read "H. J. ...". The signature is fluid and cursive, written over a few lines of text.

Cc: Detroit Free Press

Comments on the Draft Environmental Impact Statement for the I-94 Rehabilitation Project, FHWA- MI-EIS-01-01-D

May 11, 2001

James J. Steele
Division Administrator
Federal Highway Administration
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Lansing, MI 48933
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Jose A. Lopez, Public Hearings Officer
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P.O. Box 30050
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(517) 373-9534
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

Dear Sirs:

We, the undersigned 17 organizations, are filing joint comments that document our concerns with the Draft Environmental Impact Statement [DEIS] for the "I-94 Rehabilitation Project."

We oppose the "Build Alternative" (hereafter called the expansion alternative) as described by the DEIS. The "expansion alternative" consists of room for 24 traffic lanes and will have a staggering pricetag of \$1.3 billion for the 6.7-mile segment. This is about \$20 million per block. This alternative will increase our dependency on autos and trucks. It provides for a dangerous lack of diversity in our transportation investment. The "expansion alternative" is not in the best interest of the public trust.

This project defines a crossroad regarding the future of Southeast Michigan's transportation system. Do we continue to pour billions of dollars into new and wider highways, or do we steer Southeast Michigan in a better direction?

We, the undersigned organizations know that the better direction for this project is to diversify our transportation investments by investing in congestion-fighting transit options in our urban areas. Transit will add vitality to the City. The "expansion alternative" will suck vitality away from the project area.

We propose that the following reasonable alternative be made the preferred alternative for this project:

- Rehabilitate I-94 to its original design. This addresses the immediate need to fix the deteriorating condition of pavement and bridges. It is a more honest "rehabilitation." It doesn't render obsolete all of the construction with the associated traffic-delay cost that have plagued this vital I-94 corridor for years.
- Reduce posted speeds along this 6.7-mile section to maximize the capacity, reduce noise, reduce pollution, reduce crashes and improve energy efficiency.

- Further add transportation capacity along the corridor by investing in a modern commuter rail system with lines to serve Ann Arbor, Detroit and Mount Clemens. An additional line to Pontiac would offer an alternate to I-75 commuters who use I-94 to access areas of Central Detroit. Per SEMCOG data, a modern 3-line commuter rail system would cost about \$200 million, equivalent to the cost budgeted for traffic control during construction of the "expansion alternative."
- Further add transportation capacity along the corridor by investing in SpeedLink Bus Rapid Transit along Gratiot to Eastland, Grand River to City Limits and Michigan to Dearborn. These three lines, consisting of about 32 miles, would cost about \$385 million to establish based on SEMCOG's Transit Vision Forum during January 2001.

This alternative would meet the purpose and need of the proposed project, cost significantly less than the "expansion alternative" and meet the goals of the project as outlined below:

- Provide needed mobility along the corridor for *all* people and freight
- Enhance the potential for economic development within the City of Detroit and the study area.
- Result in beneficial social, environmental, and economic improvements to the host neighborhoods and the City of Detroit.
- Significantly reduce taxpayer investment while strengthening our transportation infrastructure through diversification.

Additional comments on the DEIS

This "expansion alternative" will have staggering adverse impacts to the human and natural environment on both the local community and the region. In addition, this alternative will be the most expensive road building projects in the state's history.

MDOT's "expansion alternative" is really 3 projects in one; the expansion of the main line, creation of the central median space, and creation of continuous service drives. MDOT intends to build these three projects three times in the I-94 corridor, Wyoming to I-96, I-96 to Conner (the current DEIS) and Conner to I-696. The project proposed in the current DEIS cannot be a successful stand-alone project and the other two segments need to be included to determine the cumulative impacts for the project. The DEIS has not addressed the cumulative impacts for the full project.

We challenge the scoping process that led to the study of only one segment of a larger much more damaging project (a proposed expansion of I-94 between Wyoming Ave in Detroit and I-696 in Macomb County.) Either the plan is to expand I-94 both east and west of this initial segment and it is segmentation, or it is not. The community needs to know what they are getting into if they say yes to this project.

In addition, nothing is provided in the DEIS to justify the expansive service drives proposed, the real need for the additional capacity of I-94, and the need for the space in the middle.

Where the DEIS goes beyond assertions and provides data such as on the projected level of service information provided, the "expansion alternative" is clearly excessive design even without the extra space in the middle for future expansion.

The proposed I-94 expansion project raises many crucial issues about appropriate scale and capacity of urban freeways, funding priorities for public transportation as well as roads within this corridor, congestion management during construction, usurpation of irreplaceable urban rail corridors, maintenance of air quality standards, mobile contributions to urban air toxics and environmental justice concerns, just to name a few. The DEIS does not provide acceptable or adequate answers.

We find the analysis and discussion of the purpose and need, project justification, air quality and noise impacts, environmental justice concerns, cumulative impacts of and alternatives to the proposed expansion to be woefully inadequate. Taken as a whole, the DEIS understates the adverse environmental impacts, ignores reasonable alternatives, and overstates both the need for and the economic benefits of this project.

Some specific technical issues that need addressed include:

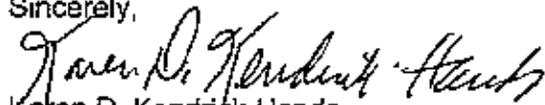
1. **Air Quality violations are concealed:** Without any explanation, MDOT has used air quality data from a suburban air monitor to under-predict the air pollution impacts from this massive expansion. If MDOT had used Detroit-based data it would be obvious that the "expansion alternative" will violate health-based national air quality standards for carbon monoxide (CO). In addition, since the DEIS indicates that truck traffic will increase faster than automobile traffic, using default model inputs on vehicle mix is inappropriate.
2. **The DEIS does not address the new standards for fine particulate matter (PM 2.5) and Ozone.** The DEIS does not address the fact that under the Air Quality Standards recently upheld by the US Supreme Court, the air in the corridor is unhealthy (does not meet attainment requirements) for both PM 2.5 and Ozone, major air pollutants from car and truck emissions. Building the "expansion alternative" violates clean air laws because it is designed to increase air pollution emissions from cars and trucks in an area where the air is already unhealthy.
3. **Air Toxics are not addressed:** The Draft Environmental Impact Statement is totally silent about the increase in toxic pollutants during construction and from the increased truck traffic. Likewise, there is no discussion of the impact of mobile source toxics on human health or on the Great Lakes ecosystem due to air deposition.
4. **No provision has been made to install aftermarket emission controls on diesel construction equipment.** Regardless of the ultimate scale of the I-94 rebuild, aftermarket emission controls (including particle traps) on all construction equipment must be required.
5. **The DEIS ignores the link between increased highway traffic and health.** Detroit's children suffer from asthma at three times the national average. The Journal of the American Medical Association reports that traffic controls imposed during the Atlanta Olympics decreased morning peak traffic counts by 23%. During this period, Medicaid-related emergency room visits and hospitalizations

- for asthma dropped by 42%. The DEIS for I-94 ignores transit and rail alternatives that could reduce traffic and the pollution it causes.
6. **The "expansion alternative" will result in more crashes and higher injury rates than maintaining the current design of I-94.** A detailed review of the crash statistics in the DEIS shows that the crash rate along I-94 in the project area is 305 per 100,000 vehicles traveled (mvm). This rate is lower than the regional average of 350 crashes. Higher crash rates within the study area occur, not along I-94 but along I-75 and the Lodge where the lanes have been expanded. Thus it is very likely that the expansion will lead to a worse crash rate. The current design of I-94 is safer than the "expansion alternative."
 7. **The international trade route rationale does not withstand close scrutiny.** MDOT has asserted that importance of I-94 overall to commerce and international trade. Nevertheless, this particular segment of I-94 is not key to the potential connections between Canada and Chicago, Fort Wayne, or Toledo. For traffic using the Blue Water Bridge between Port Huron and Sarnia, I-69 is the primary link between Canada and the west and south. This segment of I-69 is underutilized and for the most part does not pass through urban areas in Michigan. Traffic using the Ambassador Bridge to and from Canada will primarily travel I-94 west of I-96 and never use the segment discussed in the DEIS. The 6.7 segment east of I-96 is not critical to this network.
 8. **MDOT's response to environmental justice concerns is an insult.** MDOT is touting sidewalks immediately along the curb of the service drives where no one wants to walk because of the fast traffic, pollution and noise. At the same time, it appears that the pedestrian overpasses that link communities across the expressway will be removed and not replaced, thus pedestrian access will actually be worsened.
 9. **Space saved in the median for 'possible future transit' is unlikely to be effective in the future.** Light rail doesn't belong among 10 lanes of interstate traffic. Space "maybe for transit" is a ruse to create more space for truck lanes.

I-94 desperately needs to be rebuilt, but the "Expansion Alternative" cannot be justified economically, environmentally, or socially. In addressing the capacity needs of this corridor, there is the opportunity to increase the vitality of the City, not to continue to drain it.

We recommend abandonment of the "Expansion Alternative" and preparation of a supplemental DEIS that better addresses the concerns enumerated herein. Consistent with state-of-the-art transportation systems in all vibrant cities, rely on transit to increase capacity in the corridor. Use SEMCOG's transit vision, and an intermodal traffic analysis model. This project is too important to ignore the reasonable alternative as outlined at the beginning of this letter.

Sincerely,



Karen D. Kendrick-Hands
President
Transportation Riders United
On behalf of:

On behalf of

Michigan Land Use Institute
Arlin Wasserman

City of Ferndale
Tom Barwin, City Manager

Sierra Club, Mackinac Chapter
Bob Duda, Southeast Michigan Group
Chairman

East Michigan Environmental Action
Council
Ms. Libby Harris, Director

League of Women Voters of
Dearborn/Dearborn Heights
Elizabeth Linick, President

Southwest Detroit Environmental Vision
Billie Hickey, Interim Director

Michigan Environmental Council
Lana Pollack, President

Hamtramck Environmental Action Team,
(HEAT)
Rob Cedar

Dr. Eugene Perrin
Individual

Bill Houghton
Individual

Michigan Association of Rail Passengers
John D. DeLora, Executive Director

League of Women Voters,
Detroit Metropolitan Area
Carolyn Buell, President

Lung Association of Michigan
Elliot Levinsohn, Manager, Air Quality and
Environmental Health

Friends of Detroit River
Jane Mackey, Chair

Environmental Law and Policy Center
Ann Spillane, Sr. Attorney

Riverfront East Alliance
Bob Jackman, President

Ecology Center of Ann Arbor
Jeff Gearhart, Campaign Director

Public Interest Research Group of
Michigan
Brian Imus, Campaign Director

Citizens for Buses
Harold Leese

Vic Randall
Individual

From: "TRUmember" <trumember@hands-assoc.com>
To: <lopezjos@mdot.state.mi.us>
Date: 5/14/01 3:01PM
Subject: Amendment to the Letter mailed Friday 11 May, 2001

Dear Mr. Lopez-

Please consider the additional organizations who would like to sign-on in agreement with comments written by Transportation Riders United, for the draft DEIS on the I-94 "rehabilitation."
The two new organizations are:

Kay Cumbow
Contamination
8735 Maple Grove Road
Lake, MI 48632-9511
River of Life
Kathy Mitten, President,
Detroit MI

Citizens for Alternatives to Chemical

Thank you for consideration.
JGL, Transportation Riders United
1150 Griswold, Suite 2800
Detroit, MI 48226
313.963.8872
313.963.8876fax

City of Ferndale
Tom Barwin, City Manager

League of Women Voters,
Detroit Metropolitan Area
Carolyn Buell, President

Sierra Club, Mackinac Chapter
Bob Duda, Southeast Michigan Group
Chairman

Lung Association of Michigan
Elliot Levinsohn, Manager, Air Quality and
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Southwest Detroit Environmental Vision
Billie Hickey, Interim Director

Riverfront East Alliance
Bob Jackman, President

Michigan Environmental Council
Lana Pollack, President

Ecology Center of Ann Arbor
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(HEAT)
Rob Cedar

Public Interest Research Group of
Michigan
Brian Imus, Campaign Director

Dr. Eugene Perrin
Individual

Citizens for Buses
Harold Leese

Bill Houghton
Individual

Vic Randall
Individual

Kay Cumbow
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Lake, MI 48632-9511

River of Life
Kathy Mitten, President,
Detroit MI